

Suffolk Coastal & Waveney District Councils



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**DRAFT**  
**East Suffolk**  
**Food and**  
**Health and Safety**  
**Service Plan**

**2018/19**

**Approved by**

**Suffolk Coastal District Council on XX September 2018**  
**Waveney District Council on XX September 2018**

**SUFFOLK COASTAL DISTRICT COUNCIL  
WAVENEY DISTRICT COUNCIL  
EAST SUFFOLK FOOD AND HEALTH AND SAFETY SERVICE PLAN 2018/2019**

**1. SERVICE AIMS AND OBJECTIVES**

1.1 Aims and Objectives

1.1.1 Food and Safety Service

To ensure that all food businesses comply with the relevant standards, are hygienic and have adequately trained staff.

To ensure that food is fit for human consumption and that any outbreaks of food poisoning and other infectious diseases are controlled.

To secure and maintain a safe and healthy environment, for employees and members of the public, in those establishments, for which we have an enforcement responsibility.

1.1.2 Port Health Service

To ensure the control of infectious diseases into the United Kingdom via the Port of Felixstowe.

To ensure that all vessels within the Port Health District comply with international and United Kingdom health requirements, and are maintained in a hygienic condition.

To operate the Border Inspection Post at the Port of Felixstowe as defined in the Trade in Animals and Related Products Regulations 2011

To ensure the safety of products not of animal origin through enforcement of The Official Feed and Food Controls (England) Regulations 2009, the Contaminants in Food (England) Regulations 2013 and relevant European Union (EU) legislation at Felixstowe.

To control melamine and Polyamide kitchenware from China in accordance with The Plastic Kitchenware (Conditions on Imports from China) (England) Regulations 2011

To ensure the safety of products not of animal origin imported through Harwich International Port, Harwich Navyard and Mistleley Quay in accordance with the Agreement made between Tendring District Council and Suffolk Coastal District Council.

To deliver the port health service at the Port of Ipswich in accordance with the agreement made between Ipswich Borough Council and Suffolk Coastal District Council.

To ensure the safety of high risk animal feed imported through Felixstowe in accordance with the agreement made between Suffolk County Council and Suffolk Coastal District Council.

To support and further develop the Port Health Interactive Live Information System (PHILIS) for Suffolk Coastal PHA, London PHA, Liverpool PHA, Southampton PHA and Heathrow Animal Reception Centre (HARC).

### 1.1.3 Corporate Health and Safety Service

To provide a corporate health and safety service to meet the Councils' legal obligations to their employees and others who may be affected by the Councils' activities.

To investigate incidents and reports of work related ill health.

To provide staff training.

To formulate and revise health and safety policies.

To advise the Councils' responsible persons on health and safety responsibilities.

To audit the implementation of health and safety policies and procedures.

To administer the Councils' joint Health and Safety Committee.

To produce an annual report for the Chief Executive and Senior Management Team.

To liaise with union health and safety representatives.

## 1.2 Links to Council Objectives and Plans

In 2016 the Councils agreed a new East Suffolk Business Plan 2015 -2023

The Business Plan sets out the vision of the two councils and their commitment to improving the quality of life for everyone living in, working in, and visiting east Suffolk and encapsulates how the Councils seek to achieve this.

The Plan has three key strands:

- Economic growth
- Enabling communities
- Financial self sufficiency

For each of these strands the Plan sets out critical success factors and for community health this is: Enabling people to take responsibility for their own mental and physical health and well-being, helping them to live active and healthy lives, while remaining safe within their homes and communities.

Sitting beneath the critical success factors are a range of actions to help deliver the vision in the Plan. These include:

- Develop and launch 'Eat out Eat Well', a healthy food award scheme, to encourage food businesses in Suffolk to offer healthy food choices. This has been completed but work

continues to promote the scheme and encourage more food businesses to provide healthy food options on their menu. The scheme has recently been extended to take-away food businesses.

- Continue to work, with partners, to ensure east Suffolk remains a safe place for our communities
- Further improve the efficiency, effectiveness and marketing of the Council owned Port Health service software. During 2017/18 work on adapting the software for use at Heathrow Animal Reception Centre has been completed and the software successfully launched.
- Complete a pilot project to inform HMRC's One Government at the Border programme for the control of the movement of goods. This pilot has been completed and government departments are now focusing on a successful exit from the EU.

A copy of the East Suffolk Business Plan can be found [here](#).

- 1.3 Corporate Team Service Plans for Food and Safety Services and Port Health have been agreed for 2018/19 and are posted on the Councils' intranet and are updated throughout the year. The Councils' performance against the East Suffolk Business Plan will be reported to both Cabinets on a quarterly basis and will be published separately in the Councils' Annual Reports.
- 1.3 Budget Plans have also been prepared for each service area matching resources to anticipated workloads. Suffolk Coastal's Budget Book 2018/19 can be found [here](#) and Waveney's Budget Book 2018/19 can be found [here](#).
- 1.4 Regular performance review meetings are held between Heads of Service, their Cabinet Member and the team to monitor performance against targets and to assist in identifying areas for improvement within the service.

## 2. BACKGROUND

### 2.1 Profiles of the Local Authorities

The profile of East Suffolk are set out in the recently published East Suffolk Economic Growth Plan, 2018-2023. The plan sets out:

- East Suffolk – in numbers
- Profile of East Suffolk
- Summary SWOT analysis
- Strategic context for the refreshed Growth Plan
- East Suffolk Economic Growth Plan, 2018-23: Vision and Strategy
- Key sectors
- Place-based and regeneration priorities
- Delivering the Plan
- Measuring progress and KPIs
- Annex A: Looking back – and projecting forward.

A copy of the East Suffolk Economic Growth Plan can be found [here](#).

## 2.2 Organisational Structure

### 2.2.1 The Councils

Suffolk Coastal has 42 elected members, reduced from 55 following a boundary review, and the Conservative Group holds the majority of seats. Waveney has 47 elected members and a Conservative administration. Both Councils operate a Leader and Cabinet structure and the Cabinet Member with responsibility for food safety matters is Councillor Steve Gallant at Suffolk Coastal District Council (SCDC) and Councillor Mary Rudd at Waveney District Council (WDC).

The Councils comprise of 11 Service Areas:

- Legal and Democratic Services
- Planning and Coastal Management Services
- ICT Services
- Economic Development and Regeneration Services
- Environmental Services and Port Health
- Financial Services
- Housing Operations and Landlord Services
- Operations
- Communities
- Customer Services and
- Audit Partnership.

We work in partnership with Norfolk County Council to provide operational functions such as property maintenance, refuse collection and grounds maintenance.

Each Service Area has a Head of Service, Phil Gore being the Head of Environmental Services and Port Health.

The Corporate Management Team comprises the Chief Executive, two Strategic Directors and eleven Heads of Service. The Chief Executive, Stephen Baker, has overall responsibility for the efficient management and execution of both Councils' functions. See Appendix 1 for further information on the management structure.

On 25 May 2018 the Parliamentary Order required to establish a new East Suffolk Council became law and Suffolk Coastal and Waveney District Councils will become one local authority from April 2019 with elections to the new Council taking place in May 2019. An extensive programme of work is underway to support the creation of the new Council although the majority of the work to bring the food and health and safety services together was completed during the early stages of the partnership in 2010/11.

A Shadow Council and Cabinet were formed on 4 June 2018 and along with a number of member working groups will help to inform and oversee the creation of the new Council.

### 2.2.2 Service Area for Environmental Services and Port Health

The Service Area for Environmental Services and Port Health comprises five joint teams across both local authorities:

- Food and Safety
- Port Health
- Environmental Protection
- Environmental Sustainability
- Emergency Planning.

The Food and Safety and Port Health Teams contribute to the Councils' aims through activities that include:

- food safety
- imported food controls
- food hygiene regulation and promotion
- health and safety regulation and promotion
- the monitoring and control of infectious diseases including food poisoning
- the management of health, safety and welfare within the Councils
- joint working with others on environmental sustainability.

The Port Health Team is responsible for protecting public and animal health by monitoring the standards of safety of all products of animal origin, non-animal origin products and plastic kitchenware imported into the European Union and the United Kingdom at the Port of Felixstowe and for ensuring the control of hygiene and infectious disease on board vessels. The food and safety service at Waveney undertakes port health work as Lowestoft Port Health Authority.

The structures of the Food and Safety and Port Health Teams are provided in Appendix 2.

The Food and Safety Manager and three Port Health Technical Managers and Port Health Manager have been appointed as Lead Officers for food hygiene and food safety matters, in accordance with the Food Safety Act Food Law Code of Practice. A letter of appointment is contained in Appendix 3.

The Clinical Microbiology Laboratory, Ipswich Hospital and Public Health England (PHE), Colindale Food, Water and Environmental Laboratory (United Kingdom Accreditation Service (UKAS) Testing Laboratory No. 1734) provide specialist services in food microbiology and pathology. The laboratory services provided by PHE have been formalised in Service Level Agreements. The Council has appointed a number Public Analysts to provide specialist advice on food composition, labelling, and chemical and physical contaminants of food. Public Analysts are listed in Appendix 4. More recent appointments have been made under delegated authority to the Head of Environmental Services and Port Health and have been confirmed in a letter of appointment to the nominated analyst. Public Analyst Scientific Services Ltd, an arm of Eurofins, is an international organisation, with a total of 400 sites in 44 countries specialising in different areas and delivering a portfolio of over 150,000 analytical methods. Port Health has regular meetings with our Public Analysts to exchange information about forthcoming requirements and developments and to keep procedures and performance under review. Lancashire County Scientific Services work in conjunction with Concept Life Sciences (previously Scientific Analysis Laboratory) to deliver same day turnaround pesticide

results. Kent Scientific Services, an arm of Kent County Council, delivers a range of analytical services for the Port Health service.

The Food and Environment Research Agency (FERA) analyse antimicrobial residue samples submitted by the Authority. Samples of fishmeal which are checked for the presence of mammalian bone are submitted to the Veterinary Laboratories Agency at Luddington which is now part of the Animal and Plant Health Agency (APHA\*) as advised by Department of Environment, Food and Rural Affairs (DEFRA).

The review of the legislation covering foodstuffs at risk of contamination from mycotoxins and pesticides and the introduction of the high risk product legislation has seen an increase in the number of non animal origin samples taken and submitted to the Public Analysts.

We are a member of Campden BRI and as such have access to technical support on food and safety related matters.

### 2.3 Compliance and Enforcement Policy

We adopted a shared Compliance and Enforcement Policy in November 2014 covering all of the regulatory services delivered by the Councils including the food safety, health and safety and port health services.

The policy reflects changes brought about by the Regulators Code which establishes how non-economic regulators should interact with those they are regulating. The code requires regulators to:

- carry out their activities in a transparent way that helps those they regulate to comply and grow
- design simple and straightforward ways to engage with and hear the views of those they regulate
- base their regulatory activities on risk and share information about compliance and risk
- ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities.

Officers, including those with responsibility for the enforcement of food and health and safety laws, must have regard to the policy when making enforcement decisions.

## 3. **FOOD SAFETY SERVICE**

### 3.1 Scope of the Food Safety Service

East Suffolk's Food and Safety Team carry out all functions relating to food safety eg

- carry out interventions, inspections and other visits at food establishments
- contribute to the national Food Hygiene Rating Scheme
- provide advice to food business operators including help on implementing the FSA's Safer Food, Better Business food safety management system
- make checks on inland imported food control at retail and catering establishments etc.
- register, and where appropriate, approve, food establishments
- issue food export/health certificates
- investigate complaints concerning food, food establishments and food handling practices

- investigate cases of suspected and confirmed food poisoning
- deliver a food safety education programme, including the level 2 Award in Food Safety in Catering and
- the Lowestoft Port Health Authority service carries out all functions relating to food safety at ports in Waveney eg inspect ships and issue Ship Sanitation Control Certificates.

### 3.2 Demands on the Food Safety Service

The numbers of food establishments approved/registered under food safety legislation in East Suffolk is 2,542. A profile of registered/approved food establishments classified in accordance with the FSA's main use codes is given in table 1.

Table 1. Profiles of registered/approved food establishments in East Suffolk. Source: Suffolk Coastal and Waveney aggregated LAEMS returns 2017/18.

FSA Category	Number of establishments in East Suffolk
Primary producers	14
Manufacturers and Packers	100
Importers/Exporters	6
Distributors/transporters	17
Retailers	617
Restaurants and caterers	1,788
Total	2,542

There are 33 food establishments in East Suffolk that are approved/conditionally approved under EU Regulation 853/2004 producing fish, meat and dairy products etc. We have wholesale fish businesses, together with a variety of other fish-related businesses eg smokehouses and two shellfish producers with shellfish harvesting and depuration facilities. We also have a dairy that pasteurises milk and produces cream, yogurt and ice cream. Two establishments supply raw cows' drinking milk. We are the originating authority for a large frozen food manufacturer owned by a multinational company and we also have food businesses which manufacture and export yeast for the bakery industry, mill rice, and one that manufactures sauces and condiments.

Our visitor economy offers a diverse range of tourism experiences. Events attracting several thousands of people are held, these include the Suffolk Show at Trinity Park and the Latitude Festival that takes place at Henham Park. The Food and Safety Team works with the event organisers and others during the planning and delivery of the festival to ensure that the food stored, prepared and served is safe to eat and complies with food safety laws.

The Food and Safety Team perform out of hours inspections where this is necessary eg large outdoor events and Sunday/farmers' markets. Food businesses that are open for business at night, at weekends or in the early hours of the morning may be identified for occasional inspection at these times.

Lowestoft Port Health Authority (as established by The Lowestoft Port Health Order 1981 No. 88) inspects ships under the International Health Regulations 2006 to ensure ships are free from rodents and other health risks and issues Ship Sanitation Control Certificates. The majority of these inspections are undertaken on ships within the Port. The service retains the ability to carry out inspections at sea, within UK sovereign territory. Whilst the inspections are the same, this procedure involves more time and special transport and safety arrangements. Vessels or shipping



agents are charged a standard fee for these inspections, with additional costs specific to the offshore activity.

The recovery of the costs of providing the ship sanitation inspections by Lowestoft Port Health Authority contributes towards the costs of officer time. Port Health Authorities are Category 1 Responders under the Civil Contingencies Act 2004. This work has proven to be a fluctuating demand on resources.

Ships sanitation inspections anticipated in 2018/19:			
	Number of inspections	Time per inspection (hours)	Total time (hours)
Lowestoft Port Health Authority	35	2.5	82.5
Suffolk Coastal Port Health Authority	See part 15 of this service plan.		

We have a diverse range of food businesses operated by and/or associated with ethnic minorities. This includes Chinese, Bangladeshi, Turkish, Greek, Thai, Portuguese and Polish. The majority of food businesses run by these groups are takeaways, restaurants and retail shops. The food and safety service makes use of translated information made freely available by the FSA. Additional translation services may be used where there is a legal requirement to do so, or where it is necessary to help ensure that FBOs understand where action needs to be taken to protect against serious risk to public health, or to assist in efficient and effective service delivery. Additional translation services are rarely needed.

Letters sent to food business operators or customers known to have a poor understanding of English may include sentences in appropriate languages/alphabets advising the recipient of the legal importance of the letter and the need to obtain a full translation. Ship Sanitation and Vessel Food Hygiene Inspections carried out by Lowestoft Port Health Authority frequently involve working with crew and staff from all parts of the world, with the inevitable difficulties associated with a limited understanding of English.

Several food businesses cater specifically for people who are vulnerable eg as a result of age or disability. This is taken into account by appropriate risk scoring criteria used in the risk rating of such premises to determine interventions.

#### 4. SERVICE DELIVERY – FOOD SAFETY

##### 4.1 Interventions at Food Establishments

The Food and Safety Team aim to ensure that food in the districts is fit for human consumption and those outbreaks of food poisoning and other infectious diseases are controlled. To achieve this inspections and other interventions are carried out at food establishments using a risk based approach in accordance with the Food Law Code of Practice. Specialist computer software is used to record all food business establishments. These records are updated daily and are used to administer the programme of risk based inspections and other interventions.

Food establishments are risk rated using criteria set out in the Food Law Code of Practice. Establishments receive a risk rating comprised of two sets of criteria:

- the nature of their business eg risk associated with the type of food handled, processing methods, number and vulnerability of customers and
- the standard of food safety achieved and compliance with food safety law.

Hence establishments may be rated as higher risk either because of the high risk nature of their business or because of the lower standards of food safety or both. Establishments receive an overall risk rating ranging from A (highest risk) to E (lowest risk).

Unrated establishments include new businesses that are waiting for an inspection to be carried out eg they may have registered but are not ready to start trading. Examples include new businesses starting up and existing trading businesses where a new food business has registered to take over in the future. New food businesses should give at least 28 days notice before start food operations.

Establishments in the outside category include premises such as primary producers that do not form part of our risk based intervention programme. The procedure for handling food registrations, including the initial action to be taken where businesses should be registered but are not, is set down in working procedures.

Profiles of the food establishments in East Suffolk by risk rating categories A to E are shown below in table 2. The proportion of broadly compliant premises, this means businesses that had compliance levels at the time of the last inspection equivalent to a FHRS rating of 3, 4 or 5, is shown for each risk rating category A to E.

Table 2. Profiles of food establishments according to risk. Source: Suffolk Coastal and Waveney aggregated LAEMS returns 2017/18.

	A	B	C	D	E	Un-rated	Out-side	Total
East Suffolk	3	41	373	990	1,011	54	70	2,542
Broadly compliant (number)	2	23	341	984	1,010	-	-	2,360
Broadly compliant (% rounded)	67%	56%	91%	99%	100%	-	-	-

The minimum intervention frequency as required by the Food Law Code of Practice and the estimated time per intervention for each risk category are set out below in table 3.

The range of available interventions for food establishments includes inspections, monitoring, surveillance, verification, audit, sampling, education, advice, coaching, information and intelligence gathering. The regulatory burden is minimised by selecting the most appropriate intervention appropriate for the risk category of the establishment. Alternative enforcement strategies include the use of questionnaires for appropriate lower risk category E food business establishments.

Table 3. Food Law Code of Practice minimum intervention frequency and locally estimated time per intervention for each risk category.

Category	Minimum intervention frequency	Estimated time per intervention (hours)
A	6 months	5
B	12 months	5
C	18 months	3.5
D	24 months	2
E	Alternative enforcement every 3 years	1
Unrated	-	2

The numbers of food interventions due in 2018/19 by risk category in East Suffolk are show below in table 4.

Table 4. Number of food interventions due and time taken by risk category in 2018/19. Source: Uniform reporting

Category	East Suffolk interventions (number)	Estimated time per intervention (hours)	Total time for East Suffolk interventions (number x hours)
A	3 (x2)	5	30
B	42	5	210
C	227	3.5	794.5
D	545	2	1,090
E	289	1	289
Unrated (estimate)	356 <sup>1</sup>	2	712
Total	1,465	-	3,125.5

The food interventions at predominantly lower risk premises that were not completed in 2017/18 will be picked up during 2018/19 and are shown below in table 5. These are often as a result of access issues with seasonal businesses or because resources were focused on higher risk premises.

Table 5. Number of food interventions due in 2017/18 to be carried forward into 2018/19. Source: Suffolk Coastal and Waveney aggregated LAEMS returns 2017/18.

Category	East Suffolk interventions (number)	Estimated time per intervention (hours)	Total time for East Suffolk interventions (number x hours)
A	0	5	0
B	0	5	0
C	2	3.5	7
D	12	2	24
E	8	1	8
Unrated	54	2	108
Total	76	-	147

Interventions are undertaken following documented procedures. The date of a primary inspection may be brought forward eg in response to a complaint, a new food registration, material change in the business, receipt of information from the FSA, an outbreak, or seasonal business that may be

<sup>1</sup> Estimate based on interventions of unrated businesses carried out in 2017/18.

closed at the time of the next date due etc. Other interventions are carried out at other times eg in response to customer complaints, alleged cases of food poisoning, food alerts, sampling, revisits and requests for advice.

Most food businesses that supply food direct to the public receive a rating under the Food Hygiene Rating Scheme (FHRS). These ratings range from 0 (urgent improvement necessary) to 5 (very good). Businesses that receive a rating of 0, 1 or 2 have a poor level of compliance with food safety and hygiene law ie they are poor compliers. Businesses that are broadly compliant with these laws will receive at least a rating of 3 and the businesses that reach at least the minimum standards of food safety law will receive the top rating of a 5. Interventions will be brought forward for poor compliant businesses ie even if the next minimum inspection frequency date is after 31 March 2019. These interventions aim to achieve better and sustained compliance rates at poor compliant businesses. Revisits of poor compliant businesses due in 2018/19 will also be carried out. An estimate of the number of these types of interventions expected in 2018/19 and the estimated time to complete is shown below in table 6.

Table 6. Estimated interventions at poor compliers and approved premises in 2018/19.

Task	East Suffolk interventions (number)	Estimated time per business (hours)	Total time for East Suffolk interventions (number x hours)
Interventions at poor compliers	47	6	282
Approved premises	33	15	495
Total			777

The estimated number of interventions at poor compliers is based on the number of businesses with a FHS of 0, 1 or 2 as at April 2018.

The Trading Standards Department of Suffolk County Council has responsibility for food standards matters. Liaison arrangements are in place through the Suffolk Food Liaison Group to develop joint work arrangements and to help ensure that matters of joint interest, such as food labelling, imported food, Animal By-Products and allergens are discussed. Joint visits with Trading Standards Officers are made where appropriate. Copies of all food registrations received are forwarded to Suffolk County Council's Trading Standards Department.

#### 4.2 Food/hygiene of premises complaints

Officers investigate food complaints in accordance with documented procedures and, where necessary, liaise with Primary, Originating and Home Authorities during the course of investigations. In determining an appropriate course of action, the Food and Safety Team takes into consideration any reports received from the Primary, Home or Originating Authorities, and the food business identified as the cause of the complaint, and will have regard to the Councils' joint Compliance and Enforcement Policy.

Food/hygiene of premises complaints anticipated in 2018/19: Estimate based on 2017/18 complaints.

	Number of complaints	Time per complaint (hours)	Total time (hours)
East Suffolk:	300	2	600

#### 4.3 Food Sampling Policy

We recognise the contribution sampling can make to the protection of public health and the food law enforcement functions of the Authorities. We are committed to providing the resources necessary to carry out a sampling programme. Authorised Officers are responsible for undertaking our food sampling functions and we have a food sampling programme for microbiological and algal toxin purposes. The food sampling is prioritised to concentrate upon one or more of the following criteria:

- foods which are produced within East Suffolk
- the risk ratings of the premises
- any local, regional or national coordinated sampling surveys or programmes.

The majority of samples taken are done so for the purpose of monitoring, surveillance and intelligence gathering. Samples are taken in compliance with the relevant Code of Practice and consideration of our Compliance and Enforcement Policy. Official laboratories as designated by the FSA will be used for samples obtained during the sampling programme. The Public Health England

Laboratory, London, Eurofins trading as Public Analyst Scientific Services, the Councils' Public Analyst, CEFAS laboratories at Lowestoft and Weymouth and other accredited laboratories are used for the analysis of samples.

Samples may be taken during manufacturing/production processes, for the purposes of ensuring food safety and for ensuring the effectiveness of the critical controls in the process. Sampling may include swabs taken from surfaces where they are sent to an official control/accredited laboratory. The manufacturer will be notified of the result of any such sample analysis or examination.

We do not currently act as a Home Authority or Primary Authority for any food business. Where sampling identifies a problem with food manufactured outside the districts, the relevant primary, home or originating authority will be notified, and a copy of the certificate of analysis or examination forwarded to them.

Food sampling will not normally be undertaken as a constituent part of food safety intervention. It may take place if, during the intervention, the authorised officer identifies a particular problem that needs further investigation.

Samples of food received as a food complaint may require microbiological examination, chemical analysis or expert identification.

Where a particular premise or food produced in the districts is implicated with a case or cases of food borne disease, food samples may be taken and submitted for examination, for the purpose of identifying any likely source of infection, and controlling any risk to public health.

Food samples may be taken and submitted as part of a special investigation eg in response to a food hazard warning, or to other intelligence received about potential food safety and quality issues.

Samples anticipated in 2018/1			
	Number of samples	Time per sample (hours)	Total time (hours)
East Suffolk	60	3	180

The sampling of shellfish and river water in commercial shellfish production areas is carried out in consultation with the FSA and CEFAS for the purpose of maintaining the necessary EU classifications for those areas and for monitoring the risk of algal toxins. Shellfish and river water is sampled from shellfish beds in the River Deben and Butley Creek and their associated depuration plants. Samples of shellfish flesh and water are sent to CEFAS Laboratories in Weymouth and Lowestoft. It is anticipated that the main shellfish sampling and follow up action will require up to two working days per month. The majority of the sampling work at these producers is undertaken by the Student Environmental Health Officer.

#### 4.4 Control and Investigation of Outbreaks and Food Related Infectious Disease

The Food and Safety Team will assess and respond accordingly to reports of communicable diseases, including food-associated illness. The investigation of outbreaks of food poisoning is conducted in liaison with the Consultant in Communicable Disease Control (CCDC) having regard to the PHE East of England Public Health Response to Notifiable Gastrointestinal Infections (July 2015). Certain infections requiring particular information will be collected as a matter of urgency and

passed to the Anglia Health Protection Team, PHE in accordance with the East of England Standard Approach to Investigating Gastro-Intestinal Disease Cases.

Responses to reports of communicable diseases, including food-associated illness are undertaken following documented procedures.

Gastrointestinal disease case notifications anticipated requiring follow up in 2018/19:			
	Number of cases*	Time per case (hours)	Total time (hours)
East Suffolk	70	2.5	175

\*Excluding Campylobacter.

Joint civil contingency and emergency stand-by arrangements exist to respond to suspected or confirmed outbreaks of infectious disease or food poisoning with either the potential to cause serious harm or death to any person, or debilitating illness or disease to significant numbers of people, or illness or disease to particularly vulnerable populations.

#### 4.5 Food Safety Incidents

Arrangements are in place to receive FSA Food Alerts for Action and take specified action on behalf of consumers.

Food alerts for action anticipated in 2018/19:			
	Number of alerts	Time per alert (hours)	Total time (hours)
East Suffolk:	4	14	56

#### 4.6 Primary Authority and Home Authority Schemes

The Regulatory Enforcement and Sanctions Act 2008 introduced into law the principle of the Primary Authority (PA). All local authorities are required, by law, when considering enforcement action against a business with multiple outlets to follow advice agreed between the business and its PA. The purpose of these requirements is to achieve greater consistency in enforcement action in large, multi-outlet businesses.

We support PA and Home Authority (HA) schemes. Where PA partnerships are registered with the Office for Product Safety & Standards (OPS&S), an officer will contact the PA to ensure that proposed actions are not contrary to appropriate advice that the PA has previously issued.

#### 4.7 Advice to Business

We endeavour to build on their existing liaison arrangements with businesses, both to improve existing consultation arrangements, and to encourage and facilitate business growth. The team provides advice to businesses eg

- the provision of proformas to assist businesses in complying with the law
- directing enquiries to relevant sources of competent and reliable advice eg FSA website
- provision of advice to businesses during interventions, via our own website, over the telephone and via partners etc. and
- responding to requests for advice from businesses and members of the public.

Requests for food safety advice/assistance anticipated in 2018/19:			
	Number of requests	Time per request (hours)	Total time (hours)
East Suffolk	410	1.5	615

Our website gives information on setting up a new business, online channels for food business registration/application for food establishment approval, an online training course booking and payment system and online forms to submit complaints and notifications. It has other information such as allergens and Safer Food Better Business packs with links to the FSA's website for more information.

Food Registrations/changes to registrations anticipated in 2018/19:			
	Number of registrations	Time per registration (hours)	Total time (hours)
East Suffolk	300	1	300

#### 4.8 Economic Challenge

We are conscious of the need to help deliver conditions for business success whilst meeting our aims and objectives. We are particularly aware of the benefits of listening to the needs of businesses and will continue to:

- provide information and advice
- signpost sources of information
- provide local low cost training
- monitor and respond as appropriate to regular feedback from questionnaires
- deal with applications to trade in a prompt manner eg food business registration applications and applications for the approval of food business establishments
- take account of and respond to national and local influences
- regularly review our procedures.

We have supported the work of engaged Suffolk and Norfolk regulatory services working with the Norfolk and Suffolk Local Enterprise Partnership (LEP) to develop stronger links to help improve the effective and efficient delivery of regulatory services via the New Anglia Better Business for All (BBfA) partnership.

There continues to be a significant number of enquiries received from people seeking advice who are exploring the setting up of their own small business from home eg home catering. Although these tend to be low risk activities they do involve some time in tailoring appropriate advice.

The ministerial Food Law Code of Practice requires that all food establishments should receive an initial inspection. This should normally take place within 28 days of registration or from when the Authority becomes aware that the establishment is in operation. This reflects the importance of ensuring new food establishments are complying with food law.

#### 4.9 Liaison with other Organisations

We have extensive liaison in place with a wide range of other organisations. For food safety matters these include:

- Food Standards Agency
- Suffolk Food Liaison Group



- Eastern Region Sampling Group
- East of England Port Health Network
- Association of Port Health Authorities
- CCDC and the East of England Health Protection Team, PHE
- Food, Water and Environmental (FW&E) Laboratory, PHE
- DEFRA
- The Thames Estuary, Essex and Suffolk Shellfish Liaison Group
- Liaison with HM Revenue and Customs nationally and locally in relation to imported food controls and smuggled products of animal origin
- Liaison with Planning and Building Control Teams to review related applications
- Campden BRI - an independent membership-based organisation carrying out research and development for the food and drinks industry.
- Associated British Ports
- Maritime and Coastguard Agency
- Trading Standards/Environmental Health Departments nationally as required
- Care Quality Commission
- Suffolk Adult Safeguarding Board
- New Anglia Better Business for All partnership.

#### 4.10 Food Safety Promotion

We promote food safety using materials made available by the FSA that are intended for businesses or the public. Examples include helping business operators meet regulations on food hygiene through promoting and supporting the FSA's Safer Food, Better Business packs together with the use of FSA material via social media eg Food Safety Week.

The team has a programme to deliver the Level 2 Award in Food Safety in Catering.

## 5. RESOURCES

### 5.1 Financial Allocation

Details of budgetary provisions are included in [Suffolk Coastal's Budget Book 2018/19](#) and [Waveney's Budget Book 2018/19](#).

Our corporately managed legal services provide support to service areas. There is also financial provision made to enable the use of external legal services, where appropriate.

### 5.2 Staffing Allocation

#### 5.2.1 Head of Service

The Head of Environmental Services and Port Health is Phil Gore who provides a 0.45 FTE towards achieving the Joint Food and Health and Safety Service Plan.

#### 5.2.2 Food and Safety Team

The Food and Safety Team has full time equivalents available for food safety related work as follows in table 7.

Table 7. FTE food safety

	Professional staff	Support staff
East Suffolk	Food safety 7.07 FTE	0.98 FTE

The resource allocation set out in table 7 above is sufficient to complete the estimated programme of work outlined in the service plan for 2018/19 and set out in table 8 below. Additional unplanned work may require reprioritisation within the plan.

Table 8. Summary of work programme: East Suffolk professional staff time allocation

Tasks	Time allocation (hours)
Ships inspections (Lowestoft Port Health Authority)	82.5
Food interventions due 2018/19	3125.5
Food interventions carried over from 2017/18	147
Poor compliers	777
Approved premises	495
Complaints	600
Sampling	180
Gastrointestinal cases investigations	175
Food alerts	56
Advice/assistance	615
Food registrations	300

Revisits, report writing, myConversations, procedure updating, officer training and development, lead officer roles, peer review, team meetings, student training, Eat Out, Eat Well award, food export/health certificates, FOIs and EIRs, media enquiries, data protection requests, further enforcement and advisory work, teaching courses and website updates etc.	4,043
Total	10,596

### 5.2.3 Staff Development Plan

Our People Development Strategy has the development of our workforce at its heart. Evidence requirements are around good understanding of objectives and drivers, meeting skills needs, reviewing the learning.

The Councils have harmonised their staff appraisal schemes and have published their agreed values and behaviours. The values are about a collective, positive attitude; about working together as one team, every day and how we aspire to behave collectively. The five values are proud, dynamic, truthful, good value and united. These values will be embedded as an important part of staff culture and development. As part of the myConversation scheme, officers formally discuss their performance and development with their line manager every few weeks. Progress with the plan is reviewed so any issues can be raised. Relevant training areas are identified to ensure the requirements for authorised officers are met.

Relevant training areas are identified to ensure the requirements for authorised officers in accordance with the Food Law Code of Practice are met.

The Food and Safety Team ensures that all enforcement officers are appropriately qualified and receive regular training to maintain and improve their level of competency. All officers are expected to have access to the equivalent of at least 20 hours food CPD. A mixture of both internal and external training helps officers to achieve this aim.

A well established programme at Suffolk Coastal helps to provide practical training to student EHOs. Arrangements are in place for Suffolk Coastal's Port Health Authority to fund the annual appointment of a student EHO to receive practical training. The appointment of the student is coordinated by an officer from the Food and Safety Team who also manages and oversees the student's training programme.

## 6. **QUALITY ASSESSMENT**

### 6.1 Quality Assessment

The Food and Safety Team has a range of documented procedures which are subject to monitoring and review. A countywide common procedure template, aligned to the current Food Law Code of Practice, has been adopted.

### 6.3 Inter Authority Audits and Peer Review

The principle of inter authority audits (IAA) is fully supported. The Food and Safety Team has undertaken inter-authority inspection and quality and monitoring. Peer review takes place amongst the team eg discussions during team meetings and joint visits.

#### 6.4 Internal Monitoring Arrangements

The Food and Safety Team has the following arrangements in place to assist in the quality assessment of the work carried out:

- documented work procedures (under a process of continuous review)
- samples of post-inspection reports, letters and notices are checked
- a sample number of inspections, either by shadowing or a follow-up visit or file review at team meetings.
- one to one meetings.

The contents of statutory notices are discussed and agreed, where appropriate, with the appropriate manager or colleague before service.

#### 6.5 Customer Satisfaction Surveys and Complaint Procedures

Customer satisfaction is collected on training courses and business satisfaction is collected via online surveys and feedback forms. A statistical summary of the results of these surveys is shown in Appendix 5.

The Councils publish complaint procedures and customer service standards on their website. A summary of complaints received in 2017/18 is produced in Appendix 6.

The FSA introduced an Independent Business Appeals Panel in response to the government's small food manufacturers review (part of the Focus on Enforcement Campaign). The Independent Business Appeal Panel considers complaints or appeals against advice given by local authorities in England about food safety and food standards that a food business operator thinks is incorrect or goes beyond what is legally required. No cases relating to our service have been taken to the Independent Business Appeal Panel to date.

#### 6.6 Team Meetings

The Food and Safety Team schedules monthly meetings to discuss all matters relating to operational issues of the service, including issues relating to competency and consistency. The meetings are used to review procedures and provide an opportunity to promote, explore and produce benefits of partnership working.

#### 6.7 Bench Marking

The Food Standards Agency (FSA) publishes on their website the food safety enforcement activity carried out by all local authorities in the UK. This information is collated from the Local Authority Enforcement Monitoring System (LAEMS) statistical returns provided by local authorities and provides a resource to bench mark performance with other local authorities. The FSA also reports this performance data to Government and Europe.

Monitoring performance against the standards set out in the Joint Food and Health and Safety Service Plan is via management meetings and annually to full Councils.

## 7. REVIEW – FOOD SAFETY

### 7.1 Identification of any Variation from the Service Plan – Food Safety

The Food and Safety Team continue to perform well during a period of significant changes and challenges to working practices. The team continues to work hard to meet the challenges facing local authorities and from reduced staff resources in recent years.

All officers are authorised over a range of legislation that includes the food safety activities set out in parts 4 to 8 of this service plan and the occupational health and safety activities set out in parts 9 to 14. Officers and support staff work flexibly across both of these types of activities so the proportion of time spent on food safety compared with health and safety varies according to workloads and priorities.

Factors that adversely affected the team's capacity to deliver the service in 2017/18 were predominantly unplanned and not routine:

- enforcement staff dealing with three fatal incidents at various stages
- prosecution for alleged contraventions of health and safety law involving public safety at a stadium
- investigation, with expert assistance from the Health and Safety Executive, of a workplace accident involving a fork lift truck
- following the decision by our previous training course awarding organisation to voluntarily surrender its own recognition Food and Safety Team members have provided training for the new food hygiene and occupation health and safety qualifications. This has required familiarisation with a new syllabus and associated presentation materials.

These factors put pressure on staff but the team responded well to ensure that consumers were protected.

The Joint Food and Health and Safety Service Plan 2017/18 was largely completed with regards to food safety.

- We worked with Customer Services to prioritise a comprehensive review and revision of our e-forms as set out in 7.2. Work on developing other new e-forms planned for 2017/18, with online payment as appropriate, will now be picked up in the business processes for an East Suffolk Council.

### 7.2 The food safety key achievements in 2017/18 worthy of note are:

- We incorporated performance management software to:
  - provide enhanced facilities to allow staff to manage and assess food intervention workloads, improve performance management, monitoring and reporting and
  - assisted in a project to cleanse and update our food registration database.
- As part of a corporately led project we explored improving mobile working options. This included assessing a mobile working solution provided by the existing supplier of our environmental health computer system and trialing a generic App designed for auditing.

- Reviewed, revised and updated many document templates that we use to include changes to reflect the corporate Style Guide.
- Incorporated and used the FSA's range of aide-memoires for local authority officers when carrying out hygiene inspections of approved premises.
- Worked with other Suffolk LAs to deliver a countywide Outside Event Caterers and Event Venues project to ensure that businesses are provided with consistent advice and people attending events are protected.
- Adopted internal Key Performance Indicators targets for 2017/18 and reported on these via the East Suffolk Performance Report.

Number and percentage of premises with a 3-5 food hygiene rating ie rated 'generally satisfactory' or better.

Suffolk Coastal: Year target: 0.25% improvement

Waveney: Year target: 0.75% improvement

The number of food businesses in Suffolk Coastal with FHS rating of 3-5 increased by 6 compared with the end of the year 2016/17. At the end of 2016/17 99.37% of businesses in Suffolk Coastal had a FHS rating of 3 or better. The number of food businesses in Waveney with FHS rating of 3-5 also increased by 6 compared with the end of the year 2016/17. At the end of 2016/17 96.23% of businesses in Waveney, slightly below our target, had a FHS rating of 3 or better.

A risk based approach will continue to be applied to poor complying businesses. Compliance by businesses that have a history of poor performance is often subject to fluctuation because standards sometimes drop after intervention. The FHS provides businesses with an incentive to maintain improvements. The mandatory display of ratings, as in Wales and Northern Ireland would provide a further incentive.

- Provided Authorised Officers with access to on-line training modules following the decision by the FSA to move away from providing traditional classroom-based courses.
- Responded to Food Standards Agency revised guidance on FHS allowing local authorities to make a charge to recover costs for revisits requested by the Food Business Operator (FBO). FBOs now have less time to wait to be reassessed and no limit applies to the number of requests they can make. This was in line with our 2017/18 plan to explore opportunities for generating income for advisory services/non statutory activities.
- The Environmental Health Technical Support Officers who joined the team at the end of 2016 have become well established and are carrying out core roles to support authorised officers in their work and to help improve our business processes.
- Officers attended the New Anglia Better Business for All (BBfA) programme launch. BBfA is a Government supported partnership approach to creating the conditions to support growth. Providing more effective business support to facilitate the growth of Small and Medium-sized Enterprises is an action point in the East Suffolk Business Plan 2015 – 2023.

- We implemented a coordinated plan to sample food produced from approved premises located in East Suffolk.
- Took samples of shellfish/river water in Suffolk Coastal as part of the statutory shellfish harvesting classification programme and algal bio-toxin monitoring programme. This work was largely undertaken by the student EHO as part of practical training.
- Joined up with the Eastern Inshore Fisheries and Conservation Authority (Eastern IFCA) and co-ordinated multi-agency response to multiple incidents of dog illnesses reported following consumption of marine species washed up onto the beaches of eastern England after winter storms. The agencies involved included Cefas, the Food Standards Agency, Public Health England, local authority environmental health departments, the Marine Management Organisation and the Environment Agency.

Samples of marine species from the beaches in the affected areas were analysed for a suite of naturally occurring marine neurotoxins of dinoflagellate origin. Toxins causing paralytic shellfish poisoning (PSP) were detected. Cefas issued advice to vets and pet owners. We will continue to liaise with other agencies, take advice and respond as appropriate to PSP.

- We continued to deliver the food hygiene training programme with 72 candidates attending the full day Level 2 Award in Food Safety in Catering. No candidate failed and was offered an opportunity to retake the exam. Attendance at these tutor led courses has declined. This is believed to be linked to the increase in food handlers undertaking on-line training.
- Customer satisfaction surveys show that 90% of delegates rate training courses with the top rating of 'good' and the other 10% rated them 'average'.
- 94% of businesses who responded to a survey following an inspection said that they were treated fairly, 5% neither agreed nor disagreed and 1% disagreed.
- We worked with Customer Services to:
  - comprehensively review and revise the criteria that guides Customer Contact Assistants with customers' enquiries
  - provide support to Customer Contact Assistants through learning sessions to improve knowledge and develop competence to help improve customer experience and
  - review and revise new customer contact e-forms used by Customer Services to ensure that appropriate information is gathered from customers to enable enquiries to be channeled and prioritised effectively.
- We published the contact e-forms on our website to enable customers to complaints about:
  - suspected or confirmed food poisoning
  - other suspected or confirmed infectious disease
  - contaminated or unsatisfactory food
  - dirty food premises
  - other food issue.
- We published the East Suffolk Common Food Complaints Guide containing self help advice for common food complaints together with explanations and suggestions for when to contact us or take some other course of action.

- We worked with our Communication Teams to support Food Safety Week 2017 by tweets on Safe Summer Food.
- We worked with other Suffolk local authorities to encourage businesses to sign up to the Suffolk Health and Wellbeing Board supported Eat Out Eat Well award. To qualify for the award, businesses must show their commitment to providing healthier choices; this includes keeping fat, sugar and salt to a minimum, making fruit and vegetables widely available and basing main meals on starchy carbohydrates. There are three levels of award: bronze, silver and gold. The level awarded is based on an assessment that takes into account the type of food on offer, cooking methods, and how businesses promote healthy choices to their customers. As at June 2018 there were 39 businesses with an EOEW in East Suffolk award: 6 gold, 21 silver and 11 bronze. The development and launch of the Eat Out Eat Well award has delivered a specific Action point in the East Suffolk Business Plan 2015 – 2023.
- Lowestoft Port Health Authority issued 33 Ship Sanitation Control Certificates/Ship Sanitation Control Exemption Certificates
- We submitted annual data returns to the FSA's Local Authority Enforcement Monitoring System (LAEMS) relating to food safety in 2017/18. A summary of the interventions, enforcement actions and compliance data is shown in table 9 below (2016/17 data provided for comparison). Higher risk establishments were prioritised for inspection. Outstanding interventions will be rolled over to 2018/19.



Table 9. Summary of food interventions, enforcement actions and compliance data for Suffolk Coastal and Waveney. Source: LAEMS returns for 2017/18.

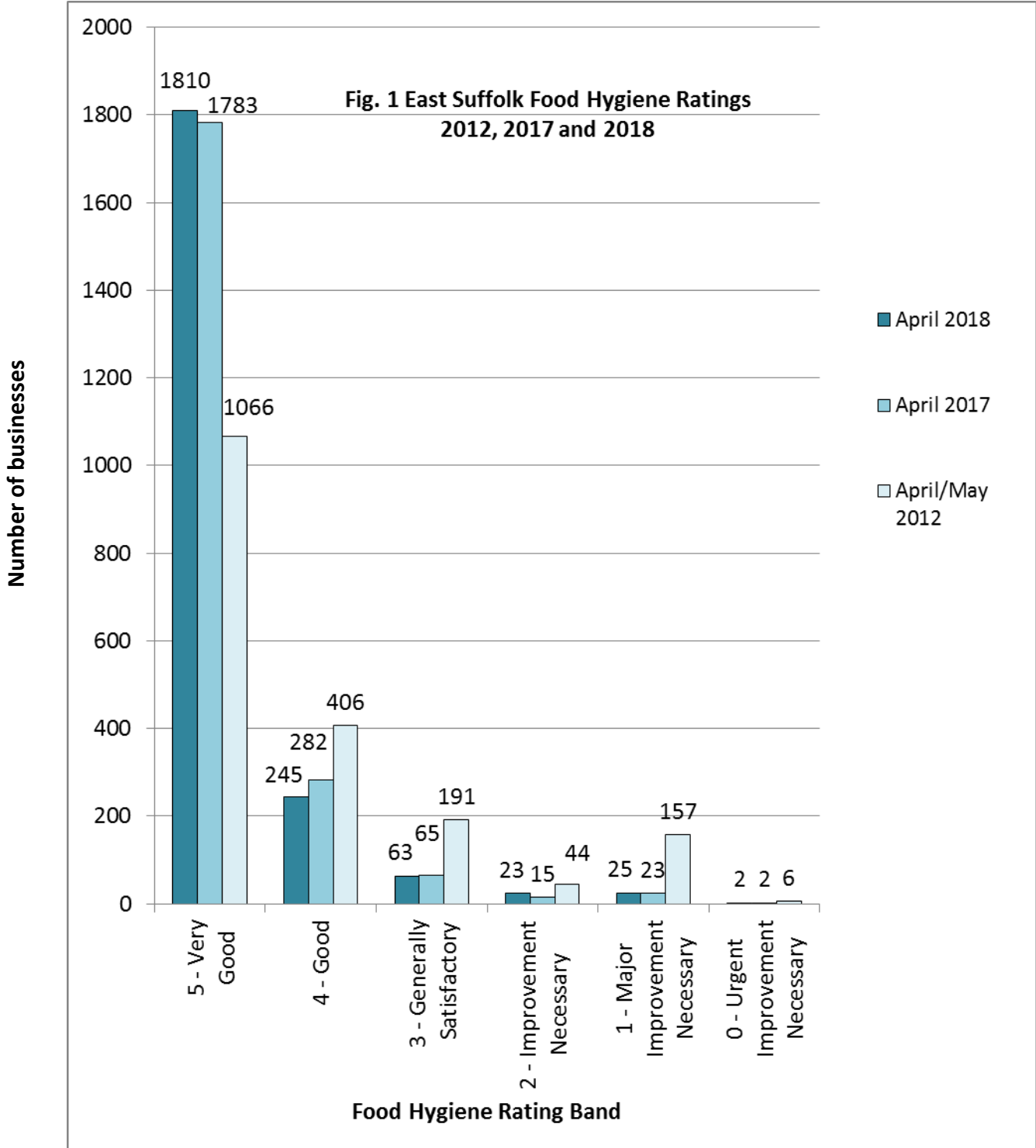
LAEMS Criteria		East Suffolk		Suffolk Coastal	Waveney
		2017/18	2016/17	2017/18	2017/18
Total % of interventions achieved by premises category. Interventions include: inspections and audits, verification and surveillance, sampling visits, advice and education visits, and information/intelligence gathering.	A	100% (35 interventions)	100% (12 interventions)	100% (15 interventions)	100% (20 interventions)
	B	100% (94 interventions)	100% (109 interventions)	100% (23 interventions)	100% (71 interventions)
	C	99.36% (314 interventions)	99.14% (349 interventions)	100% (125 interventions)	98.93% (185 interventions)
	D	97.95% (586 interventions)	99.02% (511 interventions)	99.04% (308 interventions)	96.58% (254 interventions)
	E	97.93% (387 interventions)	99.59% (489 interventions)	97.41% (226 interventions)	98.64% (145 interventions)
	Unrated	199 interventions	157 interventions	94 interventions	105 interventions
% Broadly compliant. All categories (excluding unrated and outside)		97.6%	96.75%	99.35%	95.76%
% Broadly compliant. All categories (including unrated)		95.47%	94.87%	96.4%	94.47%
No. of establishments subject to:					
– Written warnings		621	660	235	386
– Improvement notices		3	1	2	1
– Emergency Prohibition Notices		0	0	0	0
– Prohibition Orders		0	0	0	0
– Voluntary closures		0	1	0	0
– Seizure, detention and surrender of food		2	1	0	2
– Remedial Action Notices		2	0	0	2
– Prosecutions		0	0	0	0
– Simple cautions		0	0	0	0
– Suspension/ revocation of approval		0	0	0	0
Samples taken		63	36	33	30
Complaint investigations -		38	26	15	23

Table 9. Summary of food interventions, enforcement actions and compliance data for Suffolk Coastal and Waveney. Source: LAEMS returns for 2017/18.

LAEMS Criteria	East Suffolk		Suffolk Coastal	Waveney
	2017/18	2016/17	2017/18	2017/18
food				
Complaint investigations – hygiene of premises	262	186	123	139

- The Food Hygiene Rating scheme (FHRS) helps people choose where to eat out or shop for food by giving information about hygiene standards in places supplying food direct to the public. It also recognises businesses that achieve good standards of food safety and hygiene.
- Each food business is given a food hygiene rating on a scale from 0 to 5 when it is inspected by a local authority officer. The top rating is '5' – this means the hygiene standards are very good. A business that meets the legal minimum standard will achieve a 5. The bottom is '0' – this means urgent improvement is required. Food businesses are given a sticker that they can put on their window/door. All ratings are published on the FSA's website. The distribution of ratings in Figure 1 show that, over the six years up to April 2018, 744 more businesses in East Suffolk achieved a top FHRS rating of 5 compared to 2012.

Fig 1. Distribution of Food Hygiene Ratings in East Suffolk.



- In conjunction with our Communication Team we continued to use Twitter to regularly highlight businesses that achieve a top FHRs rating of 5.
- In order to ensure that the FHRs is fair to businesses, it has been designed to include a number of safeguards. These are: an appeal procedure; a right to reply; and an opportunity to request a re-visit when improvements have been made in order to be re-assessed for a new rating. Information about these safeguards is provided to food businesses when they are told of their rating and it is also available on the Councils' and FSA's websites. One FHRs appeal was received in 2017/18. The appeal was more than 21 days after the food business operator was told of the rating and in accordance with the FSA's national Brand Standard, it was not accepted.

Table 10. Food Hygiene Rating Scheme Revisit Requests, Right to Reply and Appeals received 2017/18.

FHRs safeguard	East Suffolk
Revisit requests	23
Right to Reply	0
Appeals - upheld	0
Appeals - not upheld	0
Appeals - over 21 days	1

- We registered 408 new food business operators/recorded changes to registrations as detailed below. The increase on 2016/2017 has been driven by a work to cleanse and update our database.

East Suffolk	
2017/18	2016/17
408	238

- We responded to 406 food safety advice/assistance service requests.

East Suffolk	
2017/18	2016/17
406	420

- Infections requiring particular information to be collected were promptly followed up and passed to the Public Health England (PHE) Anglia Health Protection Team, in accordance with the East of England Standard Approach to Investigating Gastro-Intestinal Disease Cases. A national records system is used to help identify common factors and detect links to cases and outbreaks at an early stage. Cases are confirmed when a stool sample is provided by someone suffering from food poisoning symptoms and is sent to a laboratory by a GP or other health professional. Not all people suspected of having food poisoning contact their GP or provide a stool sample for testing. Therefore, the exact numbers of cases of food poisoning are not known and there is under reporting. Tables 11 and 12 below show cases of infections.

Table 11. Gastrointestinal disease cases April 2017 to March 2018 and April 2016 to March 2017. Source East of England Health Protection Team, Public Health England Centre.

	East Suffolk	
	2017/18	2016/17
E coli O157 VTEC	<10	0
Salmonellosis	22	19
Campylobacteriosis	227	255
Cryptosporidiosis	35	39
Giardiasis	14	26
Shigella dysentery	<10	<10

Table 12. Gastrointestinal disease cases April 2017 to March 2018 and April 2016 to March 2017, rate per 100,000 population\*. Source East of England Health Protection Team, Public Health England Centre.

	East Suffolk	
	2017/18	2016/17
E coli O157 VTEC	0.8	0.0
Salmonellosis	9.1	7.8
Campylobacteriosis	93.6	105.2
Cryptosporidiosis	14.4	16.1
Giardiasis	5.8	10.7
Shigella dysentery	0.4	0.4
Total	124.1	140.2

\* ONS mid-year estimates 2016

## 8. AREAS FOR IMPROVEMENT – FOOD SAFETY

8.1 In 2018/19 the Food and Safety Team plan to:

- Arrange with the FSA to move to publish FHRS ratings as East Suffolk.
- Arrange with the FSA to submit our 2018/19 LAEMS return as a joint East Suffolk set.
- Liaise with Suffolk County Council to review our database of childminders, follow up with information/advice and check compliance as necessary.
- Review our database of domiciliary care agencies, follow up with information/advice and check compliance as necessary.
- We intend to work with others in Suffolk to launch Take Out, Eat Well. This award covers:
  - chip shops and other fast food outlets that fry most of their food eg chicken and burgers
  - pizza takeaways and
  - takeaway businesses serving Indian and Chinese foods etc.
- Adopt KPIs:
  - % east Suffolk food businesses rated 3-5 FHRS (target 95%)
  - % east Suffolk food businesses improved or remained the same in the FHRS (target 85%).

## 9. HEALTH AND SAFETY SERVICE

### 9.1.1 Scope of the Health and Safety Service

We carry out interventions relating to health and safety matters in those premises for which it has enforcement responsibility eg retail, leisure, catering and hospitality, care homes (employee related only), retail and wholesale distribution warehousing etc.

- proactive inspection will be used to target the high risk activities in sectors specified by HSE in the National Local Authority Enforcement Code or where intelligence suggests risks are not being effectively managed
- engagement with event organisers in partnership with other agencies via the Safety Advisory Group to address public safety at events
- investigation of complaints concerning work premises and practices
- investigation of accidents and dangerous occurrences reported under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- health and safety education programme, including Level 2 Award in Health and Safety in the Workplace
- Sunday trading laws
- consultee as a responsible authority under the Licensing Act 2003
- registration of skin piercing activities.

### 9.10 Demands on the Health and Safety Service

The districts attract many tourists particularly during the summer months. Events attracting several thousands of people are held in both districts, these have included the Suffolk Show at Trinity Park and the Latitude Festival that takes place at Henham Park. The Food and Safety Team works with the event organisers and others during the planning and delivery of the festival to ensure that persons involved in the events and the members of the public that attend them are protected from risks to their health or safety.

## 10. SERVICE DELIVERY – HEALTH AND SAFETY

### 10.1 Health and Safety Premises Inspection and other Interventions

The responsibility for the enforcement of the Health and Safety at Work Act etc. 1974 and relevant statutory provisions is governed by the Health and Safety (Enforcing Authority) Regulations 1998 that allocate enforcement to either the Health and Safety Executive or Local Authority according to the main work activity. Since 1974 local authorities have been responsible for enforcement of the health and safety laws in places such as shops, retail and wholesale warehouses, offices, catering, restaurants, bars, hotels, care homes (without nursing care), leisure and cultural services such as golf courses, horse riding establishments and motor sports together with consumer services such as undertakers and workshops fitting tyres and exhausts.

The Health and Safety Executive is responsible for the remainder of activities eg factories, building sites, farms, vehicle repair workshops, railways, power stations, care homes providing nursing care, docks, fairgrounds, schools, colleges and Council run services.

Under a Memorandum of Understanding the Care Quality Commission now have responsibility for the regulation of health and safety in registered care homes that principally affects the service user under the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014. Local Authorities still have powers under the Health and Safety at Work etc. Act 1974 in relation to the health and safety of employees.

In May 2013 HSE published the National Local Authority Enforcement Code. The Code is designed to ensure that LA health and safety regulators take a more consistent and proportionate approach to their regulatory interventions. It sets out the Government expectations of a risk based approach to targeting. Each year the HSE hosts national update sessions to cascade the priorities for regulation for the following year. One of the Food and Safety Team officers chairs the Norfolk and Suffolk Health and Safety Liaison Group and attends this session. The HSE also publish a list of activities in types of premises that are deemed suitable for proactive intervention. The HSE use national accident data, labour force surveys and intelligence from Local Authorities to shape the annual list to ensure that resources are focused in the businesses that present the greatest risk.

HELA Circular LAC 67/2 (rev 7) provides a nationally consistent framework for guiding the Local Authority as to the appropriate interventions based on risk and efficacy where local authorities regulate health and safety. There are no predetermined inspection frequencies as it is expected that the LA will follow the Code and use intelligence such as reported incidents or complaints to decide whether a proactive inspection is justified. We are committed to improving health and safety outcomes where there is greatest risk and will reserve proactive planned inspections for those premises that present a comparatively high risk. Alternative interventions such as awareness raising campaigns and invitations to particular sectors to engage with the management of health and safety will be incorporated into the workplan.

The Food and Safety Team have used the LA National Code and local intelligence to identify the following priorities for intervention:

#### National Priorities:

- fatalities and significant injuries resulting from being struck by vehicles in high volume warehousing or distribution
- fatalities and significant injuries resulting from falls from height, amputation and crushing injuries in industrial retail or wholesale premises eg steel stockholders, builders/timber merchants
- falls from height, unstable loads and manual handling in high volume warehousing or distribution
- crowd management and injuries or fatalities to the public at large scale public gatherings eg cultural events, sports, festivals and live music
- violence at work at premises with vulnerable working conditions (lone/night working/cash handling eg betting shops/off-licences/hospitality) and where intelligence indicates that risks are not being effectively managed
- buried pipework and bulk storage of Liquefied Petroleum Gas (LPG) used in food premises and natural gas safety in catering premises will continue to be assessed when the premises are visited for food safety purposes.

How these national and local priorities will be addressed within the Councils' intervention plan:

- Manual handling in residential care homes – there has been a focus on health and safety for residents in previous years and that aspect has now been passed to the Care Quality Commission to lead on. However nationally there is evidence that employees in the residential care sector are suffering from musculoskeletal injuries as a result of manual handling practices. There is a hierarchy of controls that should be in place that means that individuals should not be put at risk and the best way to achieve this is to use the appropriate equipment to reduce the forces needed to move people and to respect the dignity of the individual being moved. The Food and Safety Team will be attending a regional training session to ensure consistency before undertaking a series of focussed visits to care homes to assess the manual handling operations. Manual handling in the wholesale and retail distribution chain.
- Swimming pool safety – the Health and Safety Executive have issued revised guidance on the safe management of swimming pools. There have been two deaths in leisure pools in Norfolk and Suffolk recently and more near miss incidents. The revised guidance advises that more effective controls are necessary in relation to supervision and life saving at small leisure pools. The Food and Safety Team will participate in a Suffolk and Norfolk wide campaign to bring this to the attention of pool operators and ensure that the risks of drowning are adequately controlled.
- Inflatable play equipment (bouncy castles) – following a recent high profile investigation and subsequent prosecution following a child’s death in Essex the Food and Safety Team will be raising awareness of the need for the operators of inflatable play equipment to understand the limitations of their particular equipment and have the means to monitor the forecast and actual weather conditions.
- Falls from height - falls from height, including where the person only falls a few feet, are known to cause significant injury and death. Working at height will be included in the selection criteria that are used to determine whether the Food and Safety Team will respond to injuries and complaints.
- Gas safety in catering businesses – gas safety is a national high priority due to the extreme risks that it poses. Gas safety will be assessed when officers from the Food and Safety Team are visiting catering premises for food safety purposes.

## 10.2 Investigation of complaints about work activities and workplaces

In addition to planned interventions the Food and Safety team will respond to complaints made by employees or other interested parties about either the place of work or work activities that they believe will affect their health or safety. Officers will use previous history and other intelligence to prioritise complaints. In 2015 Suffolk Constabulary and East of England Ambulance NHS Trust both raised concerns about safety at a premises in Suffolk Coastal. Following a visit to the premises four Prohibition Notices were served immediately and three Improvement Notices were subsequently served. In October 2017 the motor sport promoter was convicted of four offences, including a failure to comply with a formal improvement notice, failure to maintain the grandstands, failure to provide a suitable means of escape and holding an event whilst the required emergency exits were locked, and was fined a total of £100,000.



Health and safety related complaints anticipated in 2018/19:	
	Number of complaints
East Suffolk	158

### 10.3 Investigation of Accidents and Dangerous Occurrences

The Food and Safety Team will have regard to the national Health and Safety Executive/Local Authority Enforcement Liaison Committee (HELA) Circular 22/13 (rev1) Incident Selection Criteria Guidance to deliver a common proportionate, transparent and targeted approach for the selection and investigation of accidents and incidents. When deciding which incidents to investigate and the level of resource to be allocated to the investigation, account will be taken of the:

- severity and scale of potential or actual harm
- seriousness of any potential breach of the law
- duty holder's known past health and safety performance
- enforcement priorities
- practicality of achieving results
- wider relevance of the event, including serious public concern
- national guidance on targeting interventions.

The Care Quality Commission (CQC) have responsibility for investigating injuries and ill health suffered by service users in registered care settings although the provider is still required to notify the relevant health and safety enforcing authority. Such incidents are passed to CQC by Food and Safety Team officers as soon as they are initially received.

Reporting of Injuries Diseases and Dangerous Occurrences Regulations reports anticipated in 2018/19:	
	Number of reports
East Suffolk	150

It is anticipated that there will be the following numbers of Reporting of Injuries Diseases and Dangerous Occurrences Regulations reports in 2018/19: 150

### 10.3 Notification of Asbestos Removal

Notifications of asbestos removal anticipated in 2018/19:	
	Number of reports
East Suffolk	4

### 10.5 Registration, Licensing and Planning consultations

The Councils' Food and Safety Team is involved in the registration process for skin piercing activities eg tattooing under the Local Government (Miscellaneous) Provisions Act 1982. The team is also a responsible authority under the Licensing Act 2003 and is consulted on licensing applications.

### 10.6 Primary Authority and Home Authority Schemes

In April 2009 The Regulatory Enforcement and Sanctions Act 2008 introduced into law the principle of the Primary Authority (PA). All local authorities are now required by law when considering enforcement action against a business with multiple outlets to follow advice agreed between the

business and its PA. The purpose is to achieve greater consistency in enforcement action in large, multi-outlet businesses.

We support the Primary Authority (PA) scheme managed by the Office for Product Safety and Standards. Where PA partnerships are registered the team will contact the PA to ensure that proposed actions are not contrary to appropriate advice that the PA has previously issued. We do not have a PA agreement with any company in their districts.

#### 10.7 Advice to Business

The Food and Safety Team endeavour to build on their existing liaison arrangements with businesses, both to improve existing consultation arrangements, and to encourage and facilitate business growth. The team provides free advice to businesses and responds to requests for advice from businesses, members of the public and other partner agencies.

The Food and Safety Team contributes updates to the Councils' website pages and Twitter feeds. These give general health and safety information together with links to the HSE's website for more information.

#### 10.7 Economic Challenge

The Food and Safety Team endeavour to build on their existing liaison arrangements with businesses, both to improve existing consultation arrangements, and to encourage and facilitate business growth. The team provides advice to businesses eg

- provide free information and advice
- provide signposts to sources of free information
- provide local low cost training
- monitor and respond as appropriate to regular feedback from questionnaires
- process imported food controls promptly
- deal with applications to trade in a prompt manner eg food establishment approvals/skin piercing/general food establishment registrations.
- respond to national influences and
- regularly review our procedures.

We have supported the work of engaged Suffolk and Norfolk regulatory services working with the Norfolk and Suffolk Local Enterprise Partnership (LEP) to develop stronger links to help improve the effective and efficient delivery of regulatory services via the New Anglia Better Business for All (BBfA) partnership.

#### 10.8 Liaison with other Organisations

There are benefits to be gained by working in close partnership with the Health and Safety Executive and other local authorities. The Food and Safety Team has demonstrated commitment to this by having already undertaken or have plans to liaise with the Health and Safety Executive eg via meetings, other communication and initiatives involving:

- our Health and Safety Executive partnership inspectors at district level
- the Norfolk and Suffolk Health and Safety Liaison Group at county level
- the Health and Safety Executive Regional Partnership Team at regional level and the Health and Safety Policy Forum at national level.

We have also been involved in the co-ordination and conduct of joint visits and campaigns with Health and Safety Executive inspectors and participated in initiatives involving the Health and Safety Executive and neighbouring local authorities.

The Food and Safety Team has extensive liaison in place with a wide range of other organisations on health and safety matters:

- Norfolk and Suffolk Health and Safety Liaison Group
- CIEH
- LGA Practitioner Forum on Health and Safety
- HSE eg staff at the local offices, Local Authority Unit
- Planning and Building Control
- Trading Standards Officers at Suffolk County Council
- Clinical Commissioning Groups
- Suffolk Fire and Rescue Service
- Other LAs directly and through EHCnet
- Public Health England
- Licensing Team (Licensing Act 2003)
- Waveney Safety and Environment Group
- Care Quality Commission
- Suffolk County Council Adult and Child Safeguarding Teams
- Suffolk County Council Trading Standards Team
- Highways England
- Suffolk Resilience Forum
- Suffolk Joint Emergency Planning Team
- HSE/LA Eastern Region Partnership Forum
- Suffolk Police
- Maritime Coastguard Agency
- Home Office Security Industry Authority
- East of England Ambulance NHS Trust and
- New Anglia Better Business for All partnership.

#### 10.9 Flexible Warranting and local agreements

All of the Suffolk local authorities have signed an agreement under section 113 of the Local Government Act 1972. The agreement provides mutual aid between the participating local authorities by enabling suitably qualified, experienced and competent officers to carry out relevant enforcement functions across the local authorities in the event of:

- a major incident such as a significant human or animal health outbreak or a serious incident in a workplace where considerable additional resources are required
- an emergency where the enforcing authority does not have a suitably authorised officer available when required
- in response to an incident where an officer from another local authority has particular skills, experience or expertise.

## 11. RESOURCES

### 11.1 Financial Allocation

Details of budgetary provision are included in [Suffolk Coastal's Budget Book 2018/19](#) and [Waveney's Budget Book 2018/19](#).

The Councils maintain their own legal services to provide support to service areas. There is also financial provision made to enable the use of external legal services, where appropriate.

## 11.2 Staffing Allocation

### 11.2.1 Head of Service

The Head of Environmental Services and Port Health is Phil Gore who provides a 0.45 FTE towards achieving the Joint Food and Health and Safety Service Plan.

### 11.2.1 Food and Safety Team

The Food and Safety Team has full time equivalents available for health and safety regulatory work as follows:

Table 13. FTE health and safety.

	Professional staff	Support staff
East Suffolk	Health and safety 2.1 FTE	0.64 FTE

The resource allocation set out in table 13 is sufficient to complete the estimated programme of work outlined in the service plan for 2018/19. However, any additional unplanned work may require reprioritisation within the plan.

## 11.3 Staff Development Plan

Our People Development Strategy has the development of our workforce at its heart. Evidence requirements are around good understanding of objectives and drivers, meeting skills needs, reviewing the learning.

The Councils have harmonised their staff appraisal schemes and have published their agreed values and behaviours. The values are about a collective, positive attitude; about working together as one team, every day and how we aspire to behave collectively. The five values are proud, dynamic, truthful, good value and united. These values will be embedded as an important part of staff culture and development. As part of the myConversation scheme, officers formally discuss their performance and development with their line manager every few weeks. Progress with the plan is reviewed so any issues can be raised. Relevant training areas are identified to ensure the requirements for authorised officers are met.

To maintain competence, enforcement officers attend training courses run by various organisations including the HSE. The Food and Safety Team will continue to access both local and national training initiatives to ensure that all of its enforcement officers are well trained and competent. Officers will also use the online Guidance for Regulators – Information Point that is part of the Regulators’ Development website.

In 2017/18 individual team members were allocated projects areas to research and then provide a training workshop on that subject to help officers increase their own in depth knowledge of a subject and then share their experiences with other officers.

A well established programme at Suffolk Coastal helps to provide practical training to student EHOs. Arrangements are in place for Suffolk Coastal’s Port Health Authority to fund the annual

appointment of a student EHO to receive practical training. The appointment of the student is coordinated by an officer from the Food and Safety Team who also manages and oversees the student's training programme.

## 12. QUALITY ASSESSMENT

### 12.1 Quality Assessment

The Food and Safety Team has a range of documented procedures which are subject to monitoring and review.

### 12.2 Inter Authority Audits and Peer Review

The principle of inter authority audits (IAA) is fully supported. The Food and Safety Team has undertaken inter-authority inspection and quality and monitoring. Peer review takes place amongst the team eg discussions during team meetings and joint visits. In 2017 the Norfolk and Suffolk Health and Safety Liaison Group hosted and facilitated a peer review consistency exercise on effective regulation for health and safety Inspectors from Suffolk, Norfolk, Essex and the Health and Safety Executive. The health and safety regulatory service is also subject to peer review with Local Authorities in Suffolk and Norfolk via the Norfolk and Suffolk Health and Safety Liaison Group.

### 12.3 Internal Monitoring Arrangements

The Food and Safety Team has the following arrangements in place to assist in the quality assessment of the work carried out:

- documented work procedures (under a process of continuous review)
- samples of post-inspection reports, letters and notices are checked
- a sample number of inspections, either by shadowing or a follow-up visit or file reviews and
- one to one meetings.

The contents of statutory notices are discussed and agreed, where appropriate, with the appropriate manager or colleague before service or, in the case of an immediate prohibition notice, soon after.

### 12.4 Customer Satisfaction Surveys and Complaint Procedures

Customer satisfaction is collected on training courses and business satisfaction is collected via online surveys. A statistical summary of the results of these surveys is shown in Appendix 5.

We publish complaint procedures and customer service standards on our website. A summary of complaints received in 2017/18 is produced in Appendix 6.

In 2012 the Government established an independent panel to consider challenges to health and safety regulatory advice. The panel looks into issues raised by business where they believe a HSE or local authority health and safety inspector has given advice that is incorrect or disproportionate. The panel will not look at issues where other independent appeals processes exist, such as for enforcement notices or prosecutions. Ministers asked for the panel to be established following a recommendation in the Löfstedt report, which proposed that the Government introduced a challenge mechanism that allows for cases of incorrect, over-application of health and safety legislation to be addressed. No cases relating to our service have been taken to the panel to date.

## 12.5 Team Meetings

The Food and Safety Team holds meetings to discuss all matters relating to the service, including issues relating to competency and consistency. Officers are encouraged to summarise interesting cases and highlight learning points at the regular meetings.

## 12.6 Bench Marking

The Councils complete the annual LAE1 return to the HSE that can form the basis of national benchmarking. At a local level the partnership between the two Councils provides opportunities to benchmark and the Norfolk and Suffolk Health and Safety Liaison Group is also a forum to exchange approaches in the way that local authorities and the HSE work.

Monitoring performance against the standards set out in the Joint Food and Health and Safety Service Plan will be via management meetings and annually to full Councils.

## 13. REVIEW – HEALTH AND SAFETY

### 13.1 Identification of any Variation from the Service Plans - Health and Safety

See also para 7.1 above.

We are continuing to work through a period of significant change to existing working practices and face up to the challenges facing local authorities and reduced staff resources in recent years.

Factors that adversely affected the team's capacity to deliver the service in 2017/18 were predominantly unplanned and not routine:

- enforcement staff dealing with three fatal incidents at various stages
- prosecution for alleged contraventions of health and safety law involving public safety at a stadium
- investigation, with expert assistance from the Health and Safety Executive, of a workplace accident involving a fork lift truck
- following the decision by our previous training course awarding organisation to voluntarily surrender its own recognition Food and Safety Team members have provided training for the new food hygiene and occupational health and safety qualifications. This has required familiarisation with a new syllabus and associated presentation materials.

These factors put pressure on staff but the team responded well to ensure that consumers were protected.

The Joint Food and Health and Safety Service Plan 2017/18 was largely completed with regards to health and safety. However, the priorities of some items in the plan were reviewed taking a risk based approach and they were not completed:

### 13.2 The health and safety key achievements in 2017/18 worthy of note are:

- With the reduction in the level of proactive inspections over the past five years some officers were not confident to undertake interventions in the areas identified for proactive inspection. To increase knowledge and confidence individual Inspectors were allocated risk areas to research and act as a resource to their colleagues for future interventions.
- As a result of a more focused approach an officer identified that a number of the small retailers who are open late at night were at risk of suffering from aggression and violence at work. Language was identified as a barrier to providing advice and guidance so a letter was drafted to signpost them to national guidance. Although the letter was in English by giving them a document it would give the duty holder an opportunity to seek assistance from family members who are more likely to understand rather than trying to explain face to face.
- The violence and aggression project also identified that there were a number of pharmacies that were involved with delivering prescription drugs to those who cannot get to the chemist's shop or to care homes with large numbers of customers in one place. The safety of the driver working alone with quantities of controlled drugs that could be a target for violent theft had not been considered by the employer. The regulation of peripatetic workers delivering to domestic premises and working on the highway falls to the HSE. Following discussion with the HSE's Enforcement Liaison Officer it was decided that as we regulate the retail activity and were already in dialogue with the employer it would be sensible for us to raise the issue of lone working with the local chemists. Advisory letters were sent to all pharmacies on the database.
- Public safety, in particular crowd safety, has been identified by HSE as a priority and there has been a growth in East Suffolk in commercial and community events that might pose a risk to those who attend them. The multi agency Safety Advisory Group (SAG) routinely meets on a monthly basis and is made up of representatives from local authorities, the emergency services and other relevant bodies and is chaired by a member of the Food and Safety Team. SAGs review event applications to ensure that the emergency services will be prepared in the event of an emergency and advise the organisers on public safety.
- The increasing number of events self-referring to SAG shows that event organisers welcome the opportunity to gain knowledge and assistance in running a safe event. The larger events such as Latitude Festival and the Suffolk Show will always require a multi agency review by SAG due to the nature of the events. The inquiry into the events at Hillsborough 25 years ago has highlighted the need for all involved to understand how their actions might affect others and SAG is a useful forum for this.
- In 2017/18 the Senior Environmental Health Officer in the Food and Safety Team chaired the county wide Suffolk Event Safety Advisory Group when the Tour of Britain cycle tour that had stages of the race in Suffolk were reviewed. The Senior Environmental Health Officer also contributed to a training initiative on behalf of the Suffolk Resilience Forum for environmental health, building control, licensing, police, fire and emergency planning personnel who were new to the SAG process. The Senior Environmental Health Officer led a review of the county SESAG which has resulted in a consistent format for reviewing events and a consensus on how to make event plans available for members of the four district SAGs in Suffolk.

- We use a variety of information sources to determine the key risks of serious workplace accidents, injuries and ill-health and review priorities throughout the year eg matters of evident concern identified whilst on site for another purpose such as during a food safety intervention. Unsafe installation and maintenance of gas and electrical systems has once again been identified by officers with Prohibition Notices served where there was a serious risk of personal injury.
- Intelligence will also be sought via the Norfolk and Suffolk Health and Safety Liaison Group which is chaired by the Senior Environmental Health Officer. The group holds quarterly meetings, with one of these meetings reserved for training, with an objective to share information and successful project plans. These groups are attended by the HSE's Enforcement Liaison Officers for Norfolk and Suffolk (ELO) or their representative.
- The transfer or assignment of premises, where enforcement responsibility is unclear between the local authority and the HSE, would be carried out in conjunction with the ELO.
- Supported, where appropriate, the progress of the New Anglia Better Business for All (BBfA) partnership. BBfA is a Government supported partnership approach to creating the conditions to support growth. Providing more effective business support to facilitate the growth of Small and Medium-sized Enterprises is an Action point in the East Suffolk Business Plan 2015 – 2023.
- An investigation into an incident at a karting circuit that resulted in one fatality and one major injury occupied two officers for considerable time including giving evidence over the course of 5 days at a Coroner's Inquest Hearing. Although breaches of health and safety law were identified they were not found to be directly related to the incident and no enforcement action was warranted. The duty holders were adhering to the published National Karting Association (NKA) guidance and each member of the NKA is part of a Primary Authority Partnership (PAP). It transpired that there were anomalies between the NKA guidance and that published by the HSE which will be raised with the PAP.
- An officer provided supporting evidence to another local authority which was taking enforcement action against a national retailer which resulted in a successful conviction.
- Reviewed work procedures based on Health and Safety Executive/Local Authorities Enforcement Liaison Committee (HELA) Local Authority Circulars eg incident selection criteria and targeting local authority interventions etc.
- Suffolk regulatory services, working with the Norfolk and Suffolk Local Enterprise Partnership (LEP), led to a Better Business for All (BBfA) workshop attended by regulators and stakeholders from Suffolk, Norfolk and Cambridgeshire. BBfA brings together businesses and regulators to consider and change how local regulation is delivered and received.
- The Food and Safety Team was represented at the Suffolk Health and Safety Liaison Group (now joined with the Norfolk Health and Safety Liaison Group) which is chaired by the Senior Environmental Health Officer from the Food and Safety Team. Six of the seven Suffolk LAs work in partnership which has reduced the number of officers at the county liaison group and is less effective for peer review and benchmarking so Suffolk and Norfolk have joined together and will share best practice.



- Buried pipework and bulk storage of LPG serving food premises was assessed when the relevant premises were visited for food hygiene purposes; this initiative will be continued in 2018/19.
- Submitted annual data return to the HSE relating to occupational health and safety (LAE1 Local Authority Health and Safety Return). A summary is shown in table 14 below.

Table 14. Summary of the health and safety interventions, enforcement actions and compliance data Suffolk Coastal and Waveney Food and Safety Team. Source: LAE1 return 2017/18.

LAE1 Criteria	East Suffolk	Suffolk Coastal	Waveney
Proactive inspections	30	13	17
Non-inspection interventions	21	16	5
Any other targeted contact (not face to face) to educate, advise or engage duty holders	106	48	58
Reactive visits	50	24	26
Revisits following earlier intervention	16	4	12
Improvement Notices	7	5	2
Deferred Prohibition Notices	0	0	0
Immediate Prohibition Notices	5	1	4
Simple cautions	0	0	0
Prosecutions resulting in conviction	1	1	0

- Acted as responsible authority under the Licensing Act 2003 for public safety.
- Received, considered and responded where necessary to licensing consultations and processed skin piercing registrations:

Task	East Suffolk
Temporary Event Notifications	776
Other licensing consultations	107
Skin piercing registrations processed	59

- 158 events were notified to the Food and Safety Team. SAG considered 44 events at 24 meetings with the organisers and a further 28 event management plans were reviewed by SAG members as a virtual SAG.

## 14. AREAS FOR IMPROVEMENT – HEALTH AND SAFETY

14.1 In 2018/19 the Food and Safety Team plan to:

- Submit our annual LAE1 statistics for 2017/18 as a combined East Suffolk return.

## 15. SUFFOLK COASTAL PORT HEALTH AUTHORITY

### 15.1 Scope of the Port Health Service – Suffolk Coastal Port Health Authority

The Port Health Service has responsibility for all food safety and food standards matters relating to imported foods and materials in contact with food. The service includes the following:

- operation of Felixstowe Border Inspection Post (products of animal origin)
- imported food control (non-animal origin products) at Felixstowe, Harwich International Port, Harwich Navyard and Mistley Quay
- checking catch certificates for specified products to ensure the legitimacy of the products caught and to prevent the Illegal Unreported and Unregulated activities of fishing vessels
- enforcement of The Plastic Kitchenware (Conditions on Imports from China) (England) Regulations 2011 at Felixstowe, Harwich International Port and Ipswich
- imported food control, vessel inspection, and control of infectious disease at the Port of Ipswich
- control of feed covered by EU 669/2009 and EU 884/2014 at the Port of Felixstowe
- inspection of vessels to ensure compliance with international and United Kingdom health requirements
- food hygiene inspections of vessels within the dock
- control of infectious disease
- verification of organic produce at point of importation
- undertaking monitoring programmes.

Suffolk County Council is responsible for all food standards matters within the District, outside of the Port of Felixstowe and is responsible for non-animal origin (NAO) animal feed arriving at the Port. A contract has however been negotiated which sees us deliver the day to day statutory controls on high risk feed and we are continuing to work with Trading Standards to ensure an effective monitoring procedure for other animal feed imported through Felixstowe.

### 15.2 Demands on the Port Health Service

The Port of Felixstowe is the UK's busiest container port and one of the largest in Europe. It is a dedicated container port handling more than four million TEUs per year and welcoming over 3,000 ships each year including the largest container ships afloat today. Over 40% of the UK's import and export trade passes through the Port of Felixstowe. Around 30 shipping lines operate from Felixstowe offering approximately 90 services a week to and from 400 ports around the world.

The Port has awarded a contract to undertake the design and construction of approximately 13 hectares of paved container yard behind Berth 9. The creation of additional container storage will allow for the optimisation of container handling operations between the berth and the yard to further enhance the service offered to customers. The yard will add 18,000 TEU's of stacking capacity to the 130,000 TEU already available. The port welcomed 166 calls of mega-ship class vessels in 2017, more than any other port in the country. The additional storage will enhance Felixstowe's ability to facilitate the increased number of visits of these large vessels.

An additional 2 gantry cranes have been installed on Berths 8 & 9 bringing the terminals total to 12. These new cranes are the first remote control ones at the port. The drivers are located in a nearby operations centre rather than the cab 50m above the quay. The cranes are able to deal with containers stowed 11 high and 24 wide to future proof them for the next generation of vessels. The

height of 10 ship to shore cranes on Trinity Terminal is also being increased to allow them to work vessels stowed up to 11 containers high. This work is due to be completed in December 18.

Felixstowe has become the first port in the UK to handle over 1 million TEU by rail in 2017. Improvements to the Felixstowe branch line will support this increased handling. Felixstowe already has the widest choice of rail services in the UK with 33 daily services to 17 different inland locations. The new scheme will allow up to 47 freight trains to run per day in each direction between Ipswich and Felixstowe.

The Port of Felixstowe won the Port Operator of the Year at the Lloyds List Global Awards ceremony in September 2017; this was for a combination of its innovation, focus on reducing carbon dioxide, improved safety and emphasis on rail to reduce road congestion.

The increasing size of vessels and frequency of arrivals at Felixstowe is delivering significant challenges for our resource planning. Regular arrivals of small to medium sized vessel ensured a constant supply of work throughout the working week. However the fewer arrivals of much larger vessels possibly two at a time gives rise to large peaks in work. The current schedules for these vessels sees them arriving during the latter part of the week requiring a significant proportion of the statutory checks needing to be carried out at weekends when our staffing levels are at the lowest and our working day the shortest. External Consultants have undertaken a piece of work to examine more flexible ways of working which will see us meeting these demands. Customer and staff views have been sought along with looking at the way other Ports deliver their service. Their report is currently being considered by the Port Health Management Team and the Councils Senior Management Team. It is likely that the delivery of any of the report's recommendations, accepted by the organisation for implementation, will form a significant part of the demands on the service for 2018/19.

Whilst our BIPs within the TCEF and Ambient Temperature Examination Facility (ATEF) are well established and run to the highest standards, our Designated Point of Entry (DPE) was in need of additional capacity due to increased volumes and additional products being brought within the scope of checks. Construction of the new facilities was completed in summer 2015. We now have purpose built inspection facilities that provide physically separate areas for allergenic products, aromatic products and an examination area for general NAO products. It has also been constructed to allow flexibility for the future so that the use of examination chambers can be re-allocated to suit changing trade or statutory requirements. Cross functional working with other statutory bodies is also facilitated as there are separate areas for other statutory bodies to work. The new office accommodation continues to deliver benefits through its proximity to examination areas. Changes to the way the Port resources these areas continue. This year will see externally provided contractors, managed by the Port, providing the service in the TCEF in the same way that services are delivered in the ambient facilities.

Externally PHILIS is licensed to London, Mersey and Southampton and most recently Heathrow Animal Reception Centre (HARC). The recruitment of an ICT Team Leader during 2016 has allowed a review of the capacity and skills of the ICT team to be undertaken. Following this review 3 new posts have been created within the ICT team two of these roles are developer roles and the third is a Junior Systems Support Officer. One developer role remains unfilled while we assess our ongoing requirements.

A review of our ICT environment has been undertaken with a recommendation that any hardware over 5 years should be re-placed. A phased project implementation plan has been put in place by our ICT Team Leader to ensure this recommendation is implemented.

With the introduction of the General Data Protection Regulations this year we have reviewed our requirements under these provisions. Those people who subscribe to our website have been asked to re-subscribe to ensure that everyone we send the information to has given us permission to do so. Anyone who hasn't responded will be removed from the list. As part of the Regulatory requirements we have been requested by the Audit Team to produce our own Privacy Notice which will be published on our website.

Participation in Operation Cobra Mist which sought to exercise the Councils ability to work to a disaster recovery plan has highlighted the need for us to expand the disaster recovery and business continuity plans for Port Health to ensure we have a sufficient level of detail to get the service up and running in the pre-determined timescale

Work is ongoing to move to an IT solution for the management of shift rotas, leave, flexi time, CPD records and emergency contact details. Currently these are managed using varying spreadsheets. The move to a single solution for these areas should simplify and deliver time savings on our resource management and allow our people to find all this information in one place.

The notification and endorsement of organic consignments has moved to an electronic platform via TRACES NT. As a Port Health Authority we have been responsible for validating agents / the person responsible for the load on the TRACES system. This has represented a significant change from how these documents have been dealt with so information has been provided on our website to assist with the change and one of our Port Health Officers has acted as a point of contact for our customers. Currently the original Certificate of Inspection is being hand signed in addition to the electronic sign off. This will be reviewed and our processes amended when e-signatures are facilitated on TRACES NT.

The Food Standards Agency launched the Regulating our Future programme in February 2016. Its aim is to develop new sustainable approaches to regulation and have in place a new model by 2020. Feasibility studies are being undertaken on various models. A member of the Port Health Management Team is part of the programme, ensuring that the unique status of Port Health Authorities is recognised. The main focus of this work is inland food producers and premises although Port Health is being looked at as part of the EU exit programme. We will continue to input information into the strategy formulation and assess the impact of the outcomes on our method of service delivery.

The initiatives from last year that were being worked on have been significantly affected by factors outside of Port Health control; the BREXIT vote and subsequent Her Majesty's Government activity has effectively suspended the One Government at the Border (OG@B) project – it may be resurrected under a different name but we await further information. The Consistently Optimised REsilient project (CORE) came to the end of its term and we await future phases, although this was an EU funded project. The introduction of new IT systems in other Government departments requires a reassessment of data availability.

The impact of the BREXIT vote should not be under-estimated as this has become the primary focus of Her Majesty's Government. As the leading Port Health Authority in the UK, SCPHA has been in

demand for providing information to inform the decisions that are required about the UK's future border controls.

There continues to be a high level of interest from national and international organisations in visiting us to see how we carry out our work; these include visits from senior officials from other Third Country Competent Authorities, the European Commission and representatives from the UK Competent Authorities.

Animal and Plant Health Agency (APHA\*) continue to conduct audits on Products of Animal Origin controls. The frequency of these has been reduced further due to good compliance with the requirements of EU and UK legislation over the past 5 years. We will now receive one visit per year which will alternate between focusing on the facilities and veterinary checks procedures. Liaison visits will not be undertaken unless audit findings necessitate this. In house verification checks will continue as we are required to do. We will also be receiving audits under the terms of our Contracts from Tendring District Council, Ipswich Borough Council and Suffolk County Council.

The work to retain our People Focus, which stemmed from the staff satisfaction survey of 2014, has moved on, with reviews of the original work that was delivered in early 2016 now being undertaken. Port Health's core values are being rebranded with the hope of fully integrating them into the organisation internally and externally. Greater focus on promoting our values through wall art and branding is also being undertaken with the help of an external consultant. The external branding will be tied into the East Suffolk brand through the colour lines being used. Our appraisal process is also being looked at again with the view of adopting the myConversation model being used by East Suffolk. This recognises that how you achieve something is as important as what you achieve, with behaviors and performance output being used to appraise individuals. Some work to adapt East Suffolk's model for our use is required and this remains ongoing.

We anticipate undertaking 24 Felixstowe and 14 Ipswich ship sanitation inspections during 2018/19, at 2.5 hours per inspection this equates to a resource demand of 95 hours.

The work on the control of products of animal origin and products not of animal origin through Felixstowe continues to develop. Further changes are expected during 2018/19:

- The outcome of the negotiations to exit the EU could have a major impact on the service we are required to deliver. We are continuing to monitor developments as negotiations continue although a clear picture of what is going to happen has not yet emerged. Members of the Port Health Management Team will remain engaged with groups promoting an understanding of Port Health and what we do to those making the decisions to ensure that the outcome for port health controls outside of the EU can be made with a full understanding of what we do and the future implications for the service.
- The final text of the review of Regulation 882/2004 has been agreed and the new Regulation (EU 2017/625) has been published and comes into force in December 2019. It amalgamates controls across sectors such as plant and animal health, consolidates port approval status into one covering all commodities for which the port has approval – Border Control Point (BCP) and merges the current CVED and Common Entry Document (CED) documents into one document, the Common Harmonised Entry Document (CHED) for use for all products requiring statutory controls. The practical implications of the financial changes on this organisation have yet to be assessed. Representations regarding the micro-business exemption from charges were made during the discussion period but not agreed.

- The provisions of Council Directive 97/78 have been incorporated into the new Regulation and the Directive will be repealed. Currently we are waiting for the subsidiary implementing legislation which will provide the detailed legislation affecting our day to day work. These implementing regulations are expected in summer 2019. Risk based checks, in particular undertaking the physical examination based on risk of origin, eg is it a new origin, will be implemented which should lead to a significant reduction in the number of physical checks. There may also be a reduction in the current 100% identity check requirement. Once the detail is known we will need to review our procedures and working methods to ensure they are in-line with the requirements.
- A change in the import requirements for composite products (food containing processed animal products combined with vegetable material) is expected. Current proposals, not yet agreed, will require veterinary checks on all composite products. Currently, many are exempt eg if they are stable at room temperature and have less than half animal origin content. Currently we undertake a lot of unremunerated work requesting and assessing ingredients lists for such products to ensure they can be exempt from veterinary checks. The latest proposal is that such products will require an importers declaration and veterinary checks (document check only) will be undertaken on such products for which a charge can be made
- The Food Standards Agency has not made funding available for additional monitoring of non-animal origin products again this year. The FSA's Food Fraud Team is targeting products of interest and providing funding to look at these consignments. The organisation has recognised the importance of continued monitoring of non-animal origin products to identify any products which may need to be considered for inclusion in the High Risk Product Legislation and so requiring additional checks. We are formulating our own sampling plan to ensure full monitoring is undertaken of products imported through Felixstowe.
- The six monthly reviews of the High Risk Products in the Annex to Commission Decision 669/2009 continue. Some advance notice of the likely changes to the list has been available, allowing us to prepare for the changes and ensure information is available for our customers.
- A new contract has been negotiated between ourselves and Tendring District Council for the continuation of the delivery of the port health service at Harwich International Port, Harwich Navyard and Mistlely Quay by us. Consideration has been given to changes the exit from Europe may bring to Harwich International Port and the new contract is written to the satisfaction of both Councils to allow each some flexibility within the contract.
- We will continue to monitor any changes which affect our role as a Category 1 responder under the Civil Contingencies Act 2004.

The majority of new emergency control measures that have been enacted have continued to make provision for the collection of fees from importers/agents to cover the cost of delivering the new controls. We continue to make relevant representations to ensure that our ability to cost recover is not diminished.

We continue to undertake routine monitoring and testing of products which pass through our district. All our laboratories are now linked into the UKFSS Network. This has been a nationally promoted system supported by the FSA which contains details of samples taken and their results. Submission of sample information here can be done automatically through PHILIS. The public analyst/food examiner can subsequently add the result information onto the system. The FSA have direct access to all of this information so have detailed information about food quickly and can manipulate the information to look for national trends etc. without having to ask individual authorities for information. The FSA has withdrawn support for UKFSS although it currently remains available for use until September 2018. The FSA has indicated that it is working with the laboratories to find an alternative to this system for the provision of the information they need. We are maintaining links with the laboratories we use and the FSA to ensure we are aware of the changes and can provide any feedback on any proposals as to how they would affect our operations.

## 16. SERVICE DELIVERY – PORT HEALTH

### 16.1 Port Health Service

Suffolk Coastal Port Health Authority’s (SCPHA) Mission;  
Protection of Public and Animal Health

SCPHA Vision:

To be a Port Health Authority where people are at the forefront of delivering an EU leading service

SCPHA Service delivery principles:

Effective and Efficient

SCPHA Challenge

Is ‘this’ in the best interests of Port Health

The Council undertakes sampling of imported products of animal origin in accordance with detailed rules laid down by the European Commission and its own risk based monitoring plan. In addition to the statutory samples of NAO required to be taken, the Council has recognised the demands of controlling imported foods of non-animal origin and undertakes a risk based sampling programme. A Food Sampling Policy helps us to determine where to focus our sampling activity. Where financial resources allow, enhanced sampling programmes are undertaken when potential problems are identified with a product or range of products. The Food Standards Agency has developed an early warning system for products not of animal origin. The Rapid Alert System for Food and Feed information is being analysed to look at the frequency of notifications for particular hazards. This information can then be used to target products for sampling and analysis. We are currently using this information to target consignments for sampling.

Anticipated imported food samples:	
Microbiological	300
Chemical composition including Aflatoxins and others	1,900
Water	60

Resource requirement 2,260 hours.

TRACES continues to facilitate the checking of the next 10 consignments across Europe where an infringement has been found. Further consignments of the same product which fall outside of the 10 consignments and which must be sampled have to remain on the port to await satisfactory results of the 10 consignments sampled. Alternatively the importer may choose to have these consignments sampled at their expense; these can then be released on satisfactory results for that consignment. The national controls on products where an infringement has been identified remain in place. There are currently EU protective measures imposing special conditions on POAOs in relation to:

- Albania - Bivalve mollusc prohibition
- Albania - fishery products (histamine)
- Albania, Macedonia, Serbia, Montenegro - semen, ova, embryos (bluetongue)
- China - Nitrofurans and Chloramphenicol
- Guinea (Guinea Conakry) - all fishery products banned
- India - Farmed fish residues
- Japan - radiation
- Peru - Bivalve molluscs ban (Hepatitis A)
- Turkey - Bivalve Molluscs
- Ukraine - milk powder.

We have continued to operate our own routine monitoring programme for POAOs received at Felixstowe. This is based on the types of products imported through Felixstowe and is informed by priorities set by the FSA as part of the National Control Plan. The need to sample products based on rapid alerts issued by other countries has been removed as the issue of rapid alerts through TRACES triggers the sampling of the next 10 consignments of those products covered by the alert, Europe wide.

The statutory sampling of NAO products continues with changes to the six monthly lists being accommodated through our internal procedures and delivered through administrative changes to the PHILIS system which allow seamless movements between the old and new lists at the appropriate time. Enhanced sampling of NAO products deemed to be high risk but which fall outside the statutory controls is on-going through our monitoring programme. Rapid Alerts are monitored to check whether any of the products found to be unsatisfactory elsewhere are imported through Felixstowe. Work done by the FSA on consolidating such information is also assisting to identify sampling priorities. The submission and completion of CED documents for NAO products on TRACES means that rapid alerts for such products are now also being completed on TRACES. Recent revisions of existing Emergency control legislation have incorporated a pre-notification requirement on TRACES for those products so we are able to control and release more consignments via the TRACES system.

There is currently EU Emergency Control legislation imposing special conditions on NAO in relation to:

- Indian Guar gum and guar gum products for pentachlorophenol and dioxins
- Indian sesame seeds and betel leaves for salmonella
- Chinese rice and rice products for genetically modified varieties
- Fruits of the forest and wild mushrooms from areas affected by the Chernobyl incident for radiation
- Japanese origin food and feed for radiation



- Bangladeshi betel leaves ban
- Nigerian dried beans ban.

Emerging issues are Novel Foods, this complex area is one which is likely to expand in the coming years as greater awareness of issues surrounding these 'foods' becomes more widely available. New legislation covering Novel Foods has been enacted this year; this updates the definition of what constitutes a Novel Food and streamlines the application process. It is anticipated the changes will help reduce the burdens on EU and third country business seeking to place novel food products on the market and facilitate consumer access to new food innovations which have been risk assessed and whose proposed use is considered safe. We will monitor what impact these changes have on our service.

Charges for water sampling and examination for legionella and standard drinking water parameters, where such sampling is requested by the master or agent of the vessel remain. The charges cover the examination cost and the time taken to draw the samples. We will continue to undertake water sampling free of charge where such sampling is undertaken due to public health concerns about conditions on board the vessel.

All samples submitted for examination by the Port Health Team will be tested by the Public Health England, London, Colindale Food, Water and Environmental Laboratory, and all samples or complaints submitted for analysis will be tested by one of the Councils appointed, Public Analysts. CEFAS are undertaking the analysis of food and feed samples from Japan.

## 16.2 Primary Authority Schemes

The organisation has not been approached by any importer organisations to set up a Primary Authority Scheme and is not seeking to engage in any.

## 16.3 Advice to Business

We have continued to update our website with all new and any relevant changes to legislation or procedures so Felixstowe importers and agents have the most up to date information and details as to how the clearance process will be affected by the changes and what practical actions they need to take to ensure swift clearance. Links to the relevant information on our website appear on standard faxes sent out to importers and agents, allowing them to obtain further background information about any request/information we have sent to them.

The Agents Forum meetings - a three-way partnership with the Port of Felixstowe Inspection Facilities, the top 20 agents and ourselves have continued. The meetings allow discussion around each others' developments, legislation and its impact, and the efficiencies of the Port Health service. Issues raised by agents in this forum have been investigated and positive outcomes have been delivered including the streamlining of our telephone answering to focus it more on agents' requirements and needs. This has been further supported by the delivery of a Customer Focus Workshop for all our Import Control Assistants. On the basis of feedback received on this workshop, two further Customer Focus training days have been delivered for the benefit of the wider team and representatives across all groupings attended.

## 16.4 Economic Challenge

Foremost amongst the challenges of the future is the requirements for public and animal health control at the border in a post BREXIT UK. However in the absence of the UK's Exit agreement, which is not expected until late 2018, a number of options have been considered – SCPHA is relatively well placed to accommodate change. However, it should be noted that some of the potential outcomes could present significant challenges to SCPHA in the short-medium term – but we await the details of the UK's exit agreement and the UK's policy position. A full assessment of its impact on our organisation can then be made.

## 16.5 Liaison with other Organisations

The Port Health Team have extensive liaison in place with a wide range of other organisations.

- Suffolk Food Liaison Group
- CIEH East of England Region
- FSA Import and Export Division
- FSA Contaminants Division
- Animal and Plant Health Agency
- Health Protection Team and Public Health England
- DEFRA – Organic Imports Section
- DEFRA - International Trade Division
- State Veterinary Service
- Haven Ports Welfare Committee
- Liverpool Port Health Authority
- Local Government Association
- London Port Health Authority
- Medicines and Healthcare Products Regulatory Agency
- EETSA Agricultural Focus Group
- National Animal Feed Ports Panel
- National Trading Standards Board
- Liaison with HM Revenue and Customs nationally and locally in relation to imported food controls and smuggled products of animal origin
- Campden BRI
- Felixstowe Port Users Association
- Associated British Ports
- Port of Felixstowe
- Port of Ipswich
- Harwich International Port
- Harwich Navyard
- Heathrow Animal Reception Centre
- Marine Management Organisation
- Mistletoe Quay and Forwarding
- Maritime and Coastguard Agency
- Public Health England/Port Health Liaison Group
- Other Enforcement Authorities on the Port of Felixstowe
- Trading Standards/Environmental Health Departments nationally as required
- World Health Organisation (Facilitator for the Ports and Shipping Group of PAGNet is a member of the port health team)

- SHIPSAN Act project - *the project aims at developing and establishing an EU integrated strategy for safeguarding the health of travelers and crew of passenger ships and for preventing the international and trans-national spread of diseases through ships.*

## 17. RESOURCES

### 17.1 Financial Allocation

Details of budgetary provision are included in [Suffolk Coastal's Budget Book 2018/19](#).

The Council maintains its own Legal Section to provide support to service areas. There is also financial provision made to enable the use of external legal services, where appropriate.

The high risk product legislation was implemented in January 2010. This allows us to re-coup the full cost of undertaking the checks on a specified list of products assessed as posing a high risk to public health. This includes analytical cost, staff time and on costs. The provision to recover fees covers all products in the Annex so as the lists are updated and the provision to charge automatically applies to any new product added to the list. Recent NAO Emergency Control Legislation has also included provisions for us to charge for any additional checks or analysis which the legislation requires.

A review of European charging mechanisms has been included in the overall review of Regulation 882/2004 which has been redrafted as Regulation 2017/625. This will cover charging mechanisms for both POAO and NAO. The original provision for exempting micro businesses (enterprises employing fewer than 10 persons and whose annual turnover and/or balance sheet does not exceed two million Euros) from charges but not from checks put forward in draft legislation have not appeared in the final text. A full assessment of the new financial charges has not yet been carried out but initially there doesn't appear to be a significant impact on our total income. We remain involved with the consultation process for the implementation of this new legislation the BREXIT vote has added an additional dimension to these negotiations which cannot be predicted at this point in time. The main provisions of the Regulations come into force for the EU at the end of 2019.

### 17.2 Staffing Allocation

#### 17.2.1 Head of Service

The Head of Environmental Services and Port Health is Phil Gore who provides a 0.45 FTE towards achieving the Joint Food and Health and Safety Service Plan.

#### 17.2.2 Port Health Team

The Port Health Team has a total of 21.7 FTE professional staff and 24.34 FTE support staff and 6 ICT staff.

The ICT team has expanded with the addition of a Team Leader. A review carried out by the Team Leader has led to the creation of 3 new posts within the ICT team, two development roles and a Junior Systems Support Officer. Two of these roles have been recruited to with one development role on hold pending a further assessment of our requirements.

The external review of our organisation to look at the best way to deliver Port Health in the future, in terms of our capacity, rotas and roles has now reported its recommendations back to the Port Health Management Team and East Suffolk personnel. Further discussions have concentrated on the recommendation to review/restructure the Management Team and a confidential report is being taken to Senior Management Team (SMT). Future work streams and any possible changes will be determined by SMT's decision on the report and cannot be predicted at this time.

### 17.3 Staff Development Plan

Staff appraisals are conducted yearly with a follow up review six months later. In between these two meetings staff are having one to one meetings with their manager to ensure time is specifically set aside for any issues to be raised or training / development needs assessed. A review of the staff appraisal process for Port Health was one of the work streams that came out of the Staff satisfaction survey. A review is now being undertaken of the original appraisal work. The myConversation way of performance management which has been rolled out for East Suffolk staff recognises the importance of behaviours and performance output in appraising individuals. The Appraisal Review group are considering this as a model for appraisals at Port Health and are looking at ways this model can be amended for use here.

All members of PHMT including our new ICT Team Leader have now completed East Suffolk's Setting the Standard – middle management development programme.

Diversity and Mental Health training have been provided for all staff along with voluntary attendance Wellbeing training. PHMT have undertaken an additional Supporting Staff Mental Health for Managers workshop. The workshops aim is to give managers the practical skills to support staff experiencing mental ill health, whether they are present in the workplace or returning to work following a period of absence. Further mental health training is planned for PHMT to cover Mental Health in the Workplace and reasonable adjustments.

The use of our intranet - Nautilus continues to assist with some of our training needs in terms of making particular documents mandatory reads. Health and Safety documents which need to be seen and acknowledged by all staff are currently being disseminated by this method and the system records which members of staff have and have not read the necessary documents so this can be followed up with individuals as required.

Enforcement officers are required to attend POAO update seminars once every two years. These are delivered twice a year and this requirement is built into our training requirement. After many years of providing funding for imported food training the FSA has withdrawn this and this remains the case for the current 17/18 year. It is not clear if this will be re-instated at a later date or whether it will affect the delivery of the POAO update seminars which are delivered jointly by the FSA and DEFRA. The most recent BIP update course has been postponed and we await further information. The FSA are working on the production of outline content specifications for imported food training modules. How these will be delivered is yet to be decided. We have been invited to take part in the Working Group looking at these and contributing to their content.

Subscriptions to online training have been taken out for all direct enforcement staff with continuing professional development requirements. This gives access to a wide range of courses relevant to our work for a year for a single subscription fee. This will be a cost effective way of delivering some of our training requirements. The mechanism for EHOs to become Chartered members of their professional organisation is changing later this year so this may prompt some of our EHO group to

achieve this before the changes. Chartered members require an additional 10 hours CPD training compared with ordinary members, which the online training will be able to deliver for us at no additional cost. Training to ensure competency in NAO feed sampling for those undertaking the work on behalf of Suffolk County Council is ongoing and this is currently being reviewed in light of the new Code of Practice. Further officers have completed the feed training package and been authorised to undertake this work. Despite the limited number of places available for the UK we have been successful in obtaining a number of places on the EU's Better Training for Safer Food programmes. We are provided with a significant amount of relevant CPD through this programme and at this point in time it is not clear whether we will still have access to it once we exit Europe. Relevant training areas are identified from a wide range of sources to ensure the requirements for Food Enforcement Officers in accordance with the Food Law Code of Practice are met.

## **18. QUALITY ASSESSMENT**

### **18.1 Quality Assessment**

A number of arrangements are in place to ensure the quality of the services provided by the Port Health service.

### **18.2 BSI ISO 9001**

Suffolk Coastal's Port Health Services are supported by a range of written procedures, which are subject to a programme of internal audit and review. The Quality Management system has its own area on Nautilus with information covering its operation and outcomes being available for all staff. The majority of our work procedures have now been moved over to Nautilus with any new ones or updates automatically being issued through this system. BSI audits are carried out twice a year in order for us to retain the ISO 9001 accreditation. Our re-certification audit under the 2008 standard was carried out in February 2017. Organisations certified to the 2008 standard have a 3 year transition period from the date of publication of the new 2015 standard (September 2015) to move to this standard. We therefore have until the end of September 2018 to migrate over to the new standard. BSI undertook a Readiness Review and Assessment audit of our organisation in February 2018 to assist us in identifying the changes we needed to make to comply with the new standard. A subsequent Audit has taken place in May 2018 to commence the assessment of our system against the 2018 standard. In order to be recommended for certification under the new standard every clause has to be assessed by audit so we will be receiving a further audit in August 2018 to complete the assessment after which we hope to achieve a recommendation for certification under the 2018 standard. The new standard covers leadership and ensuring the management systems form part of the strategic direction of the business and increases the use of risk in determining outcomes. Changes have been made to our ISO system to ensure it meets the requirements of the 2015 standard. Further in-house training has been done with the new auditors to familiarise them with our auditing process and the first audits have now been completed. Extension of the audit schedule will follow. One of the new requirements is to ensure a level of understanding of our Quality Management System and the consequences of not following it within the organisation. To achieve this quality briefings are being given at Team Meetings and the proposal is that such updates will be given at each team meeting every quarter.

### **18.4 Internal Monitoring Arrangements**

The Port Health Team currently has the following arrangements in place to assist in the quality assessment of the work carried out:

- written work procedures (under a process of continuous review)
- Technical Managers/Senior Official Veterinary Surgeon check all notices and rapid alerts prior to them being served
- ongoing internal monitoring of processed consignments
- verification checks on POAOs
- NAO/quick job monitoring
- team meetings of the technical groupings
- one to one meetings.

A selection of files and correspondence will be monitored during the course of the year.

The Staff Satisfaction Survey identified an issue within the organisation with performance management. The developing of our performance management framework is ongoing with further work planned. Static group performance measures have been developed and are available. Interactive work group information covering our day to day activities is available on Nautilus and large screens within our work areas. Colour coded internal targets for processing our work have been agreed by the Performance review group. The interactive information allows members of the team to see at a glance which work areas are falling outside our acceptable targets facilitating the prioritisation of work for the benefit of the organisation. The Performance Review group is meeting quarterly with each member taking responsibility for ensuring that the internal monitoring programme is being undertaken within their area. Findings of this monitoring are being fed back at team meetings. Further work is planned to develop individual targets so we can feed back to members of the team how well they are performing. This should also help us to praise high performing individuals and identify if there are any individual training needs we need to address.

The Nautilus system remains our single point of contact for relevant legislation and procedures used within Port Health. New information is being entered into Nautilus as it arises and existing information is being reviewed and migrated onto Nautilus on a rolling programme. Nautilus allows for version control of documents, and can be used for on line training and assessment of staff understanding of new procedures this will assist with staff monitoring should we develop the system in this way.

## 18.5 Customer Satisfaction Survey

Our regular Agents forum meetings have allowed our customers to raise any issues with us directly. The face to face nature of this interaction allows for discussion around any issues and then an outcome to be agreed for delivery. Progress on any agreed outcomes will be reported on at the next meeting or sooner by alternative methods as appropriate. A facility exists on the website to automatically provide feedback on our service by e-mail; this comes into our main in-box so it can be dealt with promptly.

Feedback at our BSI audit suggested that information about customer satisfaction could be recorded through our day to day interactions with customers and the feedback they give us. The feedback received is evaluated and an appropriate action agreed and delivered. Such information and the actions undertaken in response along with consequences if any suggestions are not taken on board, is now recorded on Nautilus.

## 18.6 Team Meetings

The Port Health Management Team holds meetings to discuss all matters relating to the service delivery, including technical and personnel issues. Each grouping within the port health service has its own regular meeting with agendas set in the main by meeting participants with management input into each meeting.

The Review groups have strengthened cross functional meetings in relation to specific work areas and in relation to the port health development project. Members of the groups are consulting with their colleagues over this work through group team meetings.

## 18.7 Bench Marking

The migration of Food Standards Agency information to the .gov platform now means that The Multi Annual National Control Plan is currently not in the public domain as information is still being moved over. The parts of the plan which we are directly involved with have been communicated to us directly. Changes have been made to the way the samples which form part of the Control Plan are acquired. The FSA have taken on the role from Defra of developing the monitoring plan for use in UK BIPs. The intention is to develop a flexible risk based plan that links closely with individual BIP sampling plans and which will not create any unnecessary additional costs for the industry. The centrally administered residue monitoring programme has now ceased. The FSA sampling priorities for POAO which replaced the centrally administered programme have remained the same for 2018/19. It is intended that meetings with stakeholders will take place during the forthcoming year so the priorities can be reviewed for the 2019/20 period.

Monitoring performance against the standards set out in the Joint Food and Health and Safety Service Plan will be via management meetings and annually to full Councils.

## 18.8 Complaint Procedures

The Councils publish complaint procedures and customer service standards on their websites. A summary of complaints received in 2017/18 is produced in Appendix 6.

## 19. **REVIEW – PORT HEALTH**

### 19.1 Identification of any Variation from the Service Plans - Port Health

The key targets from the 2017/18 Service Plan have been mainly completed. The provision of the IT Helpdesk has not yet been completed as an assessment to compare our plans with corporate plans for a similar provision was undertaken. This remains ongoing in 2018/19.

### 19.2 The port health key achievements in 2017/18 worthy of note are:

- The undertaking of an external review of our organisation to look at how best to deliver Port Health services in the future. The review sought full staff engagement with mechanisms in place to ensure that any member of staff was able to feed views and comments into the process. Views were also sought of our customers, from those Port of Felixstowe representatives with whom we work to deliver the service and from other Port Health Authorities to look at their

practices. The recommendations of the report are currently being assessed by PHMT and any work coming out of this assessment will commence during 2018/19.

- Heathrow Animal Reception Centre are now using the custom built PHILIS application for their day to day work. They have seen a massive improvement in their efficiency of working and have said they would not wish to go back to the old manual way of working. This represents a change in use for PHILIS compared with its other users. HARC focuses on official controls for live animals arriving by air freight as opposed to consignments arriving by sea. The marketing and improvement of PHILIS forms one of Port Health's specific actions within the East Suffolk Business Plan.
- A Local Government Chronicle Award for innovation for PHILIS.
- Continued work with the Food Standards Agency Food Fraud Team to assist with surveillance work on commodities that they have highlighted an interest in.
- Protection of public and animal health via our work with imports from Cameroon containing a number of prohibited products which posed a substantial risk. Internally this required inter-team co-operation and diligence to ensure our responsibilities were undertaken correctly and co-operation with external organisations to ensure these consignments were removed from the food chain in a way which ensured the risk was contained and public and animal health protected.
- Successfully managed the addition of Egyptian grapes to the high risk list. Large numbers of this products arriving on particular vessel lines are imported through Felixstowe. As an organisation we rose to the challenge of dealing with significantly increased numbers of document checks and sampling activity concentrated into a short period of time representing the season for this product. Thanks were received from the Food Standards Agency for our handling of this situation. This product has now been removed from the high risk list so we will not face the same challenge this year from this product.
- Worked in partnership with Suffolk County Council to deliver the statutory controls on feed and the routine monitoring and sampling of imported feed.
- Commencement of the migration of our ISO:9001 – 2008 Quality management system accreditation over to the new 2015 standard and the training of additional internal auditors to support the system.
- The development of PHILIS to allow the details of available temperature records for those consignments subject to such controls to be imported into our system and checked. This has enabled us to now look at other ways of working which could streamline our processes.
- The identification of new mobile tablets suited to our needs and relevant protection for them to reduce the cost to the organisation of damage. These have been introduced alongside a User Policy to increase our security processes connected with tablet issue.
- Installation of the Chronologic workforce management system which brings together in an electronic solution a number of resource activities which are currently being managed by spreadsheets. This will support our business need for greater efficiency and managerial time saving in these areas. The application is currently being customised to our requirements and



tested by staff usage to ensure it is delivering the expected output before we fully move over to managing our resources through that as the sole system.

- Introduction of the Text Local system to assist with meeting resource requirements for the dissemination of information. This system will allow us to easily notify all staff of any organisational issues as required and also to notify specified groups of people of additional resource requirements.
- One of our officers assisted colleagues with work identifying high risk products being imported through Birmingham Airport. This was following a request from the Food Standards Agency for such assistance to be provided. Our knowledge of imported food controls has been shared with those colleagues responsible for checks at the Airport.
- Table 15 below demonstrates the following level of activity during 2017/18

Table 15. Key tasks during 2017/18

Key task	Activity
Identity checks on products of animal origin	20,828
Physical checks on products of animal origin	7,162
Checks on consignments for IUU purposes	5,838
Checks on high risk NAO products	9,406
Verification checks on Organic products	2,450
Plastic declaration documents handled	936
Samples taken	2,312
Unsatisfactory food consignments removed from the food chain	252

- Hosted a number of visits by officials wishing to see our operations first hand:
  - A delegation from the Food Safety & Standards Authority of India hosted by the Food Standards Agency have visited to look our processes and procedure for undertaking checks.
  - We have assisted colleagues from Norfolk Trading Standards with information and practical activity to demonstrate how we undertake feed controls at Felixstowe.
  - The number of visits by individual importers agents and shipping lines who wish to forge a better working relationship with us has increased. We welcome such visits as it allows us to explain the nature of our checks in detail and point them to the areas of information available for them to use and it allows us to get a greater understanding of the difficulties involved for them. We have delivered a workshop for one customer, following their request for this. This allowed us to impart knowledge about our requirements to members of their team. This hopefully will provide benefits for both organisations.

## 20. AREAS FOR IMPROVEMENT – PORT HEALTH

Suffolk Coastal Port Health Authority continues to be held in high regard nationally and internationally. Development of facilities at other UK ports continues and as their capacity increases completion for trade will intensify. We are the ‘go-to’ Port Health Authority due to our people. However, we cannot be complacent and we recognise that there is always room for improvement and development but that such changes need to be balanced with the efficient delivery of the ‘day job’ so need to be incremental and measured. Areas we intend to work on in 2018/19 are:

- Examining the requirements for public and animal health control at the border in a post BREXIT UK. However in the absence of the UK's Exit agreement, which is not expected until late 2018, a number of options have been considered. SCPHA is relatively well placed to accommodate change. However, it should be noted that some of the potential outcomes could present significant challenges to SCPHA in the short-medium term – but we await the details of the UK's exit agreement and the UK's policy position and will undertake preparation work to ensure we remain well placed to accommodate the changes.
- Work on implementing the recommendations from the external review of our service. This will ensure the service is ready for future opportunities and challenges and:
  - More effectively manage resources to match workload
  - Ensure that we have the capacity and skills to support our people, deliver our organisational responsibilities and maintain our technical knowledge/capability
  - Ensure that we are ready to take advantage of future opportunities
- Commence the implementation of 5 year ICT hardware replacement which has been recommended by our ICT Team Leader. This will help with our organisational resilience and make our business continuity plans more robust.
- Further ongoing improvements to PHILIS including further development of PHILIS Online as a contingency to enable electronic declaration of consignments post Brexit if access to TRACES is lost.

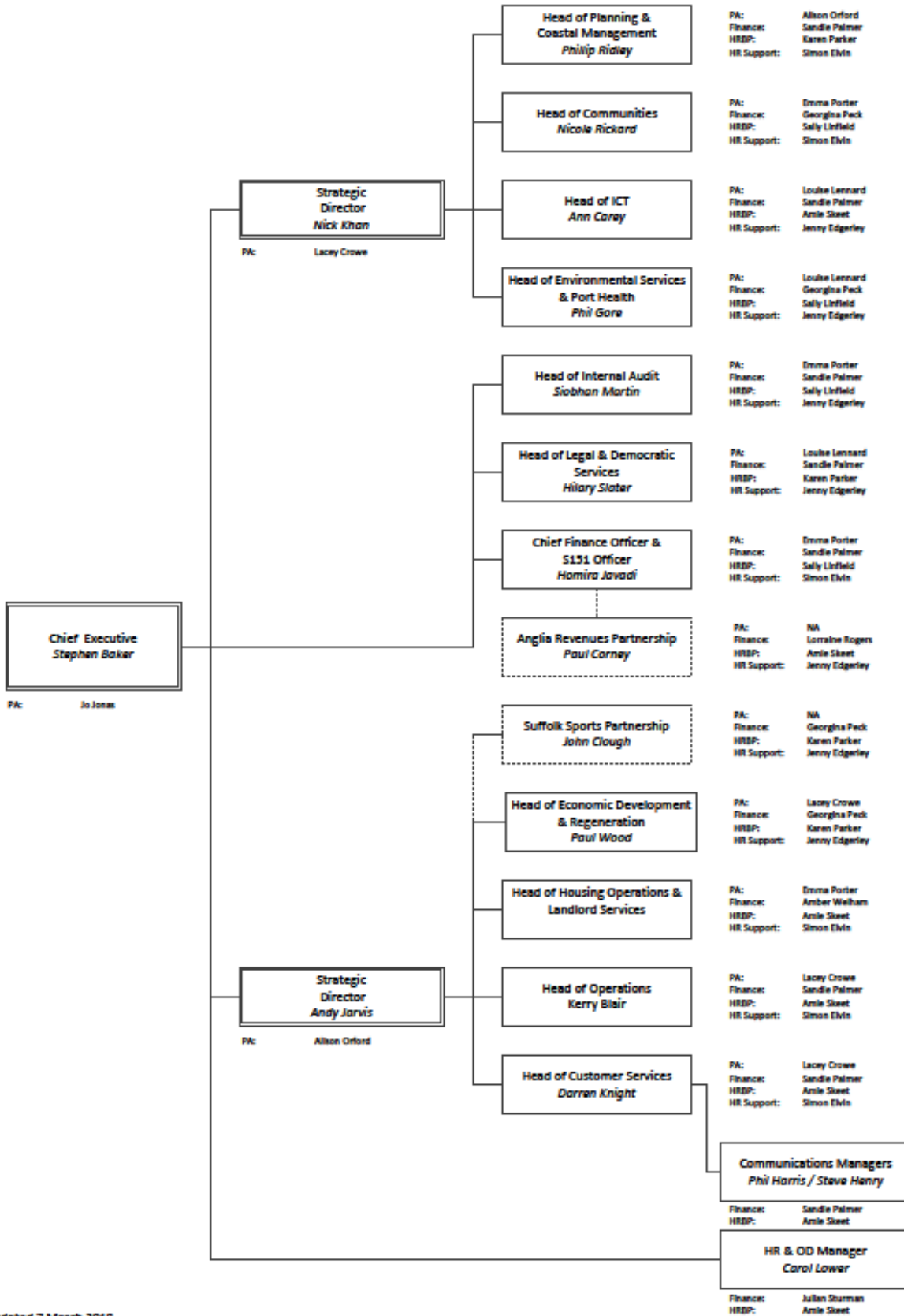
**GLOSSARY OF TERMS**

APHA	-	Association of Port Health Authorities
APHA *	-	Animal and Plant Health Agency
ABP	-	Associated British Ports
ALVS	-	Automatic License Verification System
BCP	-	Border Control Point
BIS	-	Department for Business Innovation and Skills
BSE	-	Bovine Spongiform Encephalopathy
BSI	-	British Standard Institute
BTP	-	British Transport Police
CCDC	-	Consultant in Communicable Disease Control
Campden BRI	-	Campden BRI <i>is an independent membership-based organisation carrying out research and development for the food and drinks industry.</i>
CEFAS	-	The Centre for Environment, Fisheries and Aquaculture Science
CIEH	-	Chartered Institute of Environmental Health
CED	-	Common Entry Document
CHED	-	Common Harmonised Entry Document
CHIEF	-	Customs Handling of Import and Export Freight
CMT	-	Corporate Management Team
CORE	-	Consistently Optimised REsilient project
CPS	-	Crown Prosecution Service
CQC	-	Care Quality Commission
CVED	-	Common Veterinary Entry Document
DEFRA	-	Department of Environment, Food and Rural Affairs
DExEU	-	Department for Exiting the European Union
DTI	-	Department of Trade and Industry (now Department for Business, Innovation and Skills)
<i>E. coli</i> O157	-	<i>Escherichia coli</i> O157
EC	-	European Commission
EDMS	-	Electronic document management system
EETSA	-	East of England Trading Standards Association
EHO	-	Environmental Health Officer
ELO	-	Enforcement Liaison Officer of the Health and Safety Executive
EMM	-	Enforcement Management Model
EHORB/EHRB	-	Environmental Health Officers' Registration Board/Environmental Health Registration Board
EOEW	-	Eat Out Eat Well
EPLaN	-	Eastern Ports Liaison Network
ERTS	-	Enhanced Remote Transit Sheds
EU	-	European Union
FERA	-	Food and Environment Research Agency
FSA	-	Food Standards Agency
FSA 1990	-	Food Safety Act 1990
FTE	-	Full-time equivalent
FPUA	-	Felixstowe Port Users Association
FVO	-	Food and Veterinary Office (Audit Branch of the EU)
GM	-	Genetically Modified
HACCP	-	Hazard Analysis and Critical Control Points

HAP	-	Home Authority Principle
HARC	-	Heathrow Animal Reception Centre
HELA	-	Health and Safety Executive/Local Authorities Enforcement Liaison Committee
HPA	-	Health Protection Agency
HPU	-	Health Protection Unit
HSE	-	Health and Safety Executive
HMRC	-	Her Majesty's Revenue and Customs
IMS	-	Information Management System
IAA	-	Inter-Authority Audit
ISO	-	International Organisation for Standardisation
IUU	-	Illegal Unregulated and Unreported
KPI	-	Key Performance Indicator
LAEMS	-	Local Authority Enforcement Monitoring System
LAC	-	Local Authority Circular
LAU	-	Local Authority Unit
LGA	-	Local Government Association
LGR	-	Local Government Regulation
LPG	-	Liquefied Petroleum Gas
MSD	-	Musculoskeletal Disorders
MCA	-	Maritime and Coastguard Agency
MCP	-	Maritime Cargo Processing plc
NAO	-	Non Animal Origin product
FHRS	-	Food Hygiene Rating Scheme
OFFC	-	Official Feed and Food Controls
OPS&S	-	Office for Product Safety & Standards
PASS	-	Public Analyst Scientific Services
PDD	-	Plastic Declaration Document
PEHO	-	Principal Environmental Health Officer
PHSO	-	Port Health Support Officer
PHE	-	Public Health England
PHILIS	-	Port Health Interactive Live Information System
PHMT	-	Port Health Management Team
POAO	-	Product of Animal Origin
PT	-	Phage type
RASFF	-	Rapid Alert System for Food and Feed
RDNA	-	Regulators' Development Needs Analysis
REHIS	-	Royal Environmental Health Institute of Scotland
RIDDOR	-	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
SCPHA	-	Suffolk Coastal Port Health Authority
SFBB	-	Safer Food, Better Business
SLIC	-	Senior Labour Inspectors' Committee
SVS	-	State Veterinary Service
TEU	-	Twenty-foot Equivalent Units
TRACES	-	Trade Control and Expert System
TRACES NT	-	Trade Control and Expert System New Technology
UKAS	-	United Kingdom Accreditation Service
UKFSS	-	United Kingdom Food Surveillance System

**Appendix 1**  
East Suffolk  
Management structure

**Suffolk Coastal and Waveney District Councils Senior Management Team**



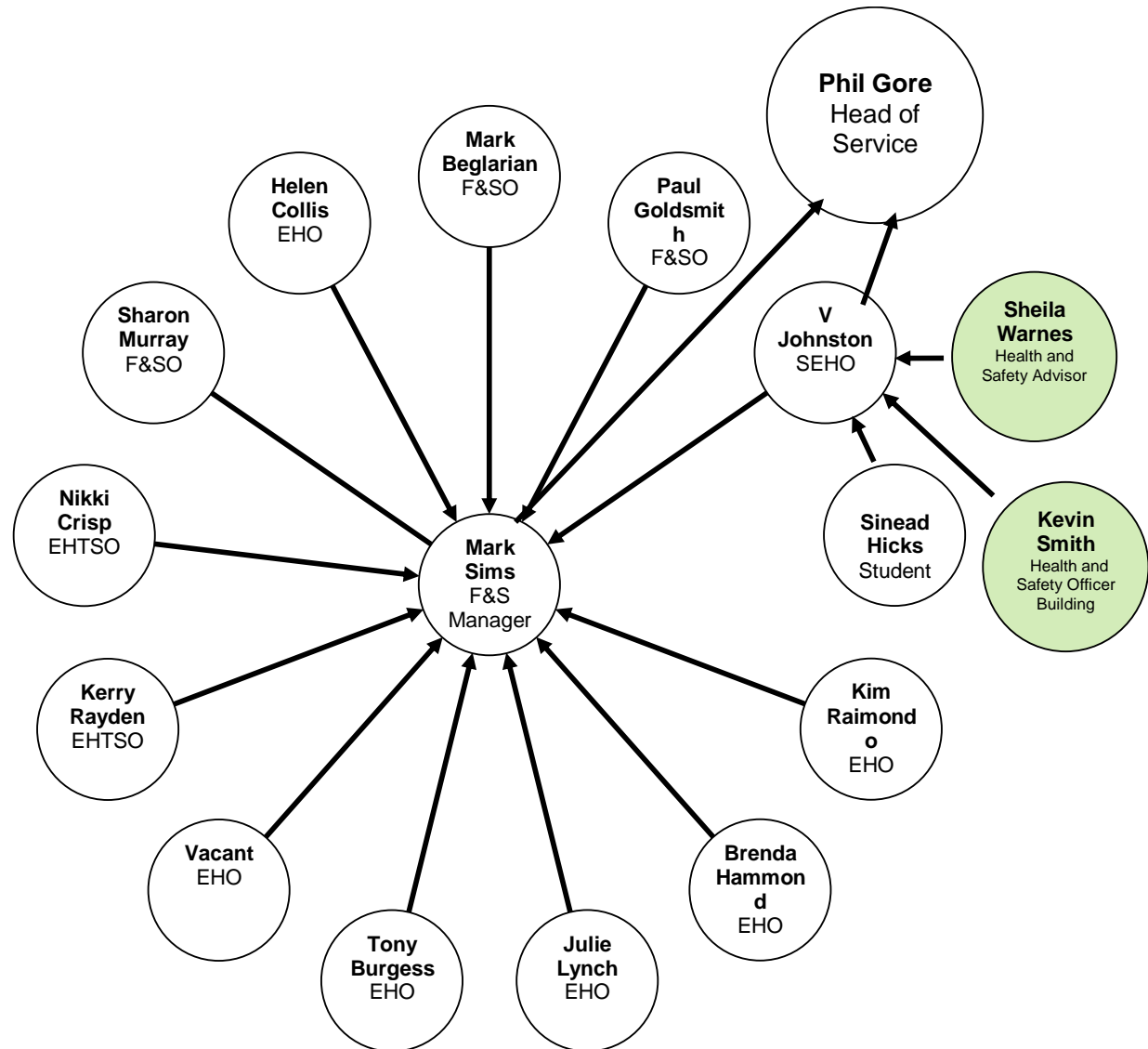
Updated 7 March 2018

## **Appendix 2**

Team structure -  
Food and Safety Team

Team structure -  
Port Health Team

Food and Safety Team  
Structure  
April 2018





# Port Health Organisational Structure April 2018

**Phil Gore**  
Head of Environmental Services & Port Health

**Richard Jacobs**  
Port Health Manager

**Kay Davidson**  
Technical Manager

**Martyn Jones**  
Technical Manager

**Brenda McRory**  
Technical Manager

**Simon Rowell**  
Senior OVS

**Hannah Panting**  
Operations Manager

**Bradley Borley**  
ICT Manager

**Port Health Officers**  
Louise Hewitt      Laurence Jarrold  
Martin Walker      Tom Green  
Kelly Cunningham      John Fawkes  
Andrew Watkinson      Sally Garrett  
Tim Ashley

**Official Veterinary Surgeons**  
Jose Arruga      Fred Ouko  
Pablo Bauluz      Daniel Sima  
Kevin Hardman      Rado Stankov  
Aurora Alonso Masferrer

**Port Health Support Officers**  
Chris Boyt      Adam Hopkins      Mick Sears  
Paul Carver      Lesley Norris      Chris Stockdale  
Sally Clarke      Tom Penso      Matt Werrett  
Hannah Gilson      Matt Plumb      Adam Flatman  
Adam Fairbrother      Laura Rowe      Georgia Woodley

**Import Control Assistants**  
Pauline Parsons      Julie Barker      Denise Potter  
Shirley Scott      Simon Little      Dawn La Mont  
Lisa Jameson      Clare Young      Carolyn Dale  
Hannah Moore      Kerry Saunders      Josh Amass  
Tasha Plummer      Laura Manning

**ICT / Project Support**  
Shaun Andrews      James Ulph  
John Bax      Samuel Holmes  
George Seward

**Other Staff**  
Dave Pilbrow (Contract TSO)

# Appendix 3

## Letter of appointment



Your Ref  
Our Ref  
Date 11 April 2014  
When calling please ask for P D Gore  
Dial Direct 0 1384 444280  
Email address pd.gore@suffolkcoast.gov.uk

Food Standards Agency  
Aviation House  
125 Kingsway  
London  
WC2B 6NH

Dear Sir/Madam

**FOOD LAW CODE OF PRACTICE (ENGLAND) – APRIL 2014  
LEAD OFFICERS FOOD HYGIENE AND FOOD SAFETY**

In accordance with paragraph 1.2.8 of the Food Law Code of Practice (England), I am writing to advise you of some minor changes to the Lead Officer roles for food hygiene and safety at Suffolk Coastal and Waveney District Councils.

**Suffolk Coastal and Waveney District Councils**

The lead officer for food hygiene and food safety is:


Mark Sims, Food & Safety Manager

**Suffolk Coastal Port Health Authority**

The lead officers for food hygiene and food safety are:

Richard Jacobs, Port Health Manager  
Marty Jones, Technical Manager  
Kay Davidson, Technical Manager  
Brenda McRory, Technical Manager

Yours sincerely

  
P D Gore  
Head of Environmental Services & Port Health  
Suffolk Coastal & Waveney District Councils

## Appendix 4

### Public Analysts

<b>Kent Scientific Services</b> <b>Kent County Council</b> <b>8 Abbey Wood Road</b> <b>Kings Hill</b> <b>West Malling</b> <b>Kent</b> <b>ME19 4YT</b>	Mr Peter Gordon Taylor Maynard MChemA CChem MRSC Mr Jonathon David Griffin BSc (Hons) MChemA CChem MRSC DMS Ms Carol Gibbons BSc (Hons) MSc MChemA FIFST MRSC CSci
<b>Hampshire Scientific Services</b> <b>Hampshire County Council</b> <b>Hyde Park Road</b> <b>Southsea</b> <b>Hampshire</b> <b>PO5 4LL</b>	Mr Shayne Gordon John Dyer MChemA CChem MRSC DMS Ms Jennifer Ann Darrington Green BSc (Hons) MSc MChemA MRSC
<b>Public Analyst Scientific Services Ltd</b> <b>Woodthorne</b> <b>Wergs Road</b> <b>Wolverhampton</b> <b>WV6 8TQ</b>	Ms Elizabeth Moran MSc MChemA MRSC Mr Ron Ennion BSc CChem MChemA FRSC MIFST Mr Kevin Wardle BSc CChem MChemA FRSC MIFST Mr Jeremy P Wootten MA MChemA CChem MRSC Mr Duncan Arthur MA MChemA CChem MRSC Mr Nigel Payne MSc, MChemA CChem MRSC Ms Joanne Hubbard BSc MChemA CChem FRSC Ms Lilian Downie MChem, MChemA, CChem, MRSC
<b>Lancashire County Scientific Services</b> <b>Pedders Way</b> <b>Ashton-on-Ribble</b> <b>Preston</b> <b>Lancashire</b> <b>PR2 2TX</b>	Mr Peter L. Mayes MChemA., MBA., CChem. FRSC Dr Andrew C. Smith B.Sc., CSci, MChemA. CChem. MRSC Mr Bharathi Reddy BSc (Hons), MChemA, CChem, MRSC

## Appendix 5

### Food and Safety Customer satisfaction summary

Course Evaluation			
	Good 😊	Average 😐	Poor 😞
How satisfied were you with the course overall?	90%	10%	0%

Business satisfaction					
	Strongly agree	Agree	Neither agree/ disagree	Disagree	Disagree strongly
I felt my business was fairly treated.	79%	14%	5%	1%	0%
I felt the contact was helpful.	82%	13%	4%	1%	0%
Communication was clear.	78%	17%	3%	3%	0%

## Appendix 6

### Summary of corporate complaints

Complaints statistics 1 April 2017 to 31 March 2018				
	Total complaints	Justified	Unjustified	To be determined
Food and Safety	4	1	3	0
Suffolk Coastal Port Health Authority	15	14	1	0
Totals	19	15	4	0